



Address Any Communication To :
CITY PLANNING COMMISSION
221 South Figueroa Street, Suite 310
Los Angeles, Ca. 90012

NOTICE OF PUBLIC HEARING TO PROPERTY OWNERS

☐ WITHIN A 500-FOOT RADIUS ☐ ABUTTING THE SUBJECT SITE

CITY PLAN CASE NO. 98-0184 (ZC/GPA)(MPR)
GENERAL PLAN AMENDMENT/ZONE CHANGE

GRANADA HILLS-KNOLLWOOD
PLANNING AREA
COUNCIL DISTRICT NO. 12

This notice is sent to you because you asked to be notified of requests, proposals, and recommendations relating to the Sunshine Canyon Landfill. As per Section 11.5.6. B. of the Los Angeles Municipal Code you are invited to attend a public hearing at which you may ask questions or present testimony regarding the proposal.

PLACE : Airtel Hotel
 7277 Valjean Street
 Van Nuys, CA

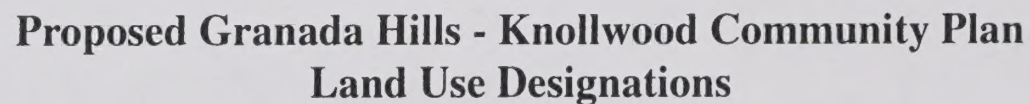
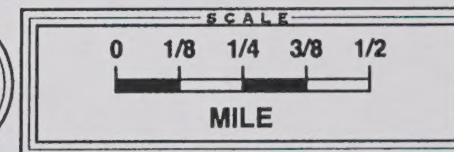
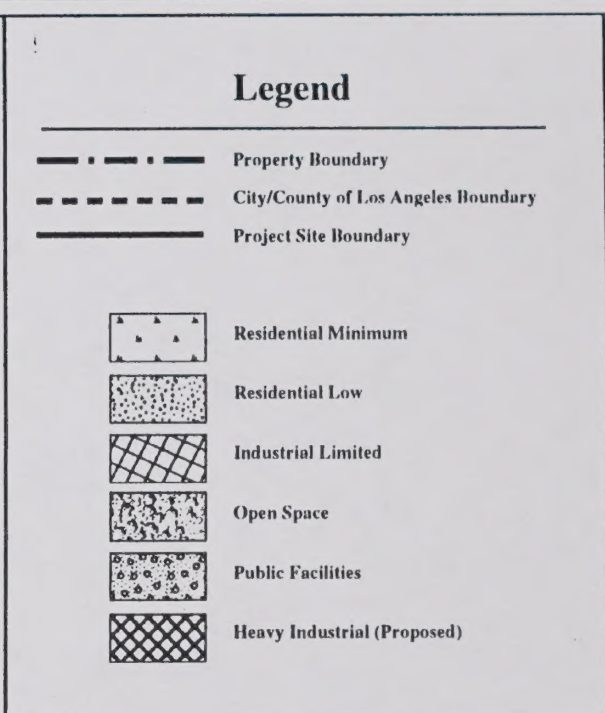
TIME : **THURSDAY, FEBRUARY 25, 1999, AT 8:30 A.M.**

PROPERTY INVOLVED: Pursuant to Section 11.5.8 of the Municipal Code, an **amendment** to the Granada Hills-Knollwood Community Plan from Open Space to Heavy Industrial and amendments to other applicable elements of the General Plan on an **ADDED AREA** consisting of a 5-acre, landlocked parcel (Tract 9673) located on the northeast side of the Sunshine Canyon Landfill, westerly of the Golden State (I-5) Freeway, and southerly of the Antelope Valley (SR 14) Freeway interchange (See map on reverse).

PROPOSAL: In conjunction with a proposed plan amendment from Open Space to Heavy Industrial on a 394-acre portion of Sunshine Canyon Landfill, located at 14747 San Fernando Road, Planning staff as part of a Major Plan Review, considered an additional property called **ADDED AREA** within the immediate area for similar change to the Plan to ensure compatibility of the Proposed Plan designation with surrounding land uses. There is no proposed development for this added area.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The hearing facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the hearing by calling the above number.

An Equal Employment Opportunity/Affirmative Action employer.



99 00217

**LOS ANGELES CITY PLANNING DEPARTMENT
STAFF REPORT TO THE CITY PLANNING COMMISSION**

CASE/FILE NUMBER: CPC 98-0184 (ZC/GPA) (MPR)
GENERAL PLAN AMENDMENT/
ZONE CHANGE

COMMISSION MEETING:
DATE: February 25, 1999
TIME: 8:30 a.m. *
PLACE: Airtel Hotel
7277 Valjean
Van Nuys, CA

RELATED CASES:

ENV'L DOCUMENT: SEIR No.91-0377-ZC/GPA
State Clearinghouse No. 92041053
Addendum, February 5, 1999

XXX PUBLIC HEARING COMPLETED on initial
Request. (Limited Hearing- Public
comment may be taken)
XXX PUBLIC HEARING ON ADDED AREA

COUNCIL DISTRICT: 12

PLAN AREA: Granada Hills-Knollwood

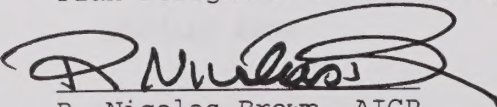
SUBJECT: 1) Pursuant to Section 11.5.8 of the Municipal Code, an **amendment** to the Granada Hills-Knollwood Community Plan from Open Space to Heavy Industrial. Pursuant to Section 12.32 of the Municipal Code, a **zone change** from A1-1-K-0 (Agricultural, Height District No.1, Equine Keeping, Oil Drilling Overlay District) to M3-1-0 (Heavy Industrial, Height District No. 1, Oil Drilling Overlay District).
2) Added Area. Pursuant to Section 11.5.8 of the Municipal Code, an **amendment** to the Granada Hills-Knollwood Community Plan from Open Space to Heavy Industrial.

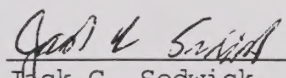
LOCATION: **Subject Site:** A 494-acre portion of **Sunshine Canyon**, located at 14747 San Fernando Road, in the City of Los Angeles.
Added Area: A 5-acre, landlocked parcel (Tract 9673) located on the northeast side of Sunshine Canyon Landfill, westerly of the Golden State (I-5) Freeway, and southerly of the Antelope Valley (SR 14) Freeway interchange.

SUMMARY: **Applicant** -Browning-Ferris Industries of California, Inc.
Proposed Project -Development, operation, maintenance and monitoring of a Class III, **non-hazardous solid waste landfill** on a 494-acre site in Sunshine Canyon, including a scale house, scale facilities, administrative offices, a caretaker facility, a lunchroom/locker storage facility, maintenance and control buildings, a leachate treatment plant and storage tanks, surface drainage systems, water storage tanks, gas monitoring stations, gas flare station and other ancillary uses. Approximately 100 acres, south of the operational landfill is proposed as a natural buffer. The footprint of the proposed landfill within the City would consist of approximately 194 acres and would provide an estimated net airspace disposal capacity of 55 million tons when connected with the proposed extension of the existing County Landfill (the "City/County Landfill"). The joint operation of the City/County Landfill would allow for a total average waste intake of 11,000 tons per day (tpd) (5,000 tpd in the City in addition to the currently authorized 6,000 tpd in the County), with a daily maximum of 12,100 tons. This total includes an average of 1,100 tpd of inert waste or peak volume disposed waste.
Added Area: No project
Plan Land Use - Open Space, corresponding zone A1

RECOMMENDATION: Deny the requests as filed.
Approve Heavy Industrial
General Plan designation on 394
acres. Approve [T][Q]M3-1-0 on 394
acres subject to conditions.
Approve Heavy Industrial General
Plan Designation for the Added Area.

Con Howe
Director of Planning


R. Nicolas Brown, AICP
Hearing Examiner
(213) 485-7868
(213) 485-8005(fax)


Jack C. Sedwick
Acting Deputy Director

ADVICE TO THE PUBLIC: * The exact time this report will be considered during the meeting is uncertain since there may be several other items of the agenda. Written communications may be mailed to: City Planning Commission, 221 S. Figueroa Street, Rm. 310, Los Angeles, CA 90012-2601. While all written communications are given to the Commission, it is suggested that letters be received in the Commission office as much in advance of the meeting date as possible. If you challenge the agenda item in court, you may be limited to raising only those issues you or someone else raised at the public hearing, as mentioned herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the Los Angeles Planning Department does not discriminate on the basis of disability and upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.

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Exhibit

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Exhibits

* These documents were distributed only to the City Planning Commission. Available for review in the Van Nuys and Downtown City Planning Department Offices.

Tabs

G Maps

Plot Plans

- E-4A: Uses Permitted within the Landfill
- E-4B: Final Elevation of Maximum Volume Operation

General Plan Maps

- E-5A: Existing Designation
- E-5B: Recommended Designation

Zoning Maps

- E-6A: Existing District
- E-6B: Recommended District

H

Subsequent Environmental Impact Report

- E-7A * SEIR Executive Summary (*Non-CEQA Document*)
- E-7B * Draft Subsequent EIR, Volume I, July 1997
- E-7C * Draft Subsequent EIR, - Appendices, Volume I, July 1997
- E-7D * Final Subsequent EIR, Volume I, June 1998
- E-7E * Final Subsequent EIR, - Appendices, Volume II, June 1998

- E-8 Addendum, February 5, 1999 (Added Area)

I

- E-9: Mitigation Monitoring and Reporting Program (MMRP)

J

- E-10: Statement of Overriding Considerations

K

Plan Resolutions

- E-11A: Sunshine Canyon Landfill
- E-11B: Added Area

L

- E-12: * Summary of the November 18, 1997 Key Group Meeting and Responses to Oral and Written Comments.

M

- E-13: * Transcripts of the October 29, 1998 Hearing Examiner Public Hearing.

N

- E-14: Applicant's November 19, 1998 Responses to the Hearing Examiner's October 23, 1998 and November 12, 1998 letters.

O

- E-15: Applicant's December 3, 1998 Supplemental Responses to Hearing Examiner's October 23, 1998 letter.

P

- E-16: Applicant's December 1998 Responses to Oral and Written Comments received from the Public Hearing.

**Attachment
Nos.**

Tabs

- Q A-1 **Issue/Response Key Matrix**
- R A-2 **January 26, 1999, Memorandum - Bureau of Sanitation**

Vegetation Communities

A-3A: Existing Vegetation Communities

A-3B: Proposed Project Impacts


A-4: **Remaining** Permitted Disposal

A-5: **Existing Landfills in County**

A-6: **Out-of County Landfills**

A-7: **Potential Landfills in County**

A-8: **Definitions, Glossary, Acronyms**



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RECOMMENDATIONS TO COMMISSION

- Section No. 1

RECOMMENDATIONS TO THE COMMISSION

Approval of the following recommendations would allow the development, operation, maintenance and monitoring of a Class III, non-hazardous solid waste landfill on a 494-acre site in Sunshine Canyon of which approximately 100 acres will be a natural buffer. The landfill will be required to be constructed in two phases. The footprint, waste disposal area, of the landfill within the City would consist of approximately 194 acres and would provide an estimated net airspace disposal capacity of 55 million tons in the City portion of Sunshine Canyon. The joint operation of the City/County Landfill would allow for an average waste intake of 11,000 tons per day (tpd) (5,000 tpd in the City in addition to the currently authorized 6,000 tpd in the County), with a daily maximum of 12,100 tons. This total includes an average of 1,100 tpd of inert waste or peak volume disposed waste.

ACTIONS RECOMMENDED, That the City Planning Commission:

Conduct a limited public hearing on the Sunshine Canyon Landfill to amend the Granada Hills-Knollwood Community Plan from "Open Space" to "Heavy Industrial", amendments to other applicable elements of the General Plan, a zone change from A1-1-K-0 (Agricultural, Height District No. 1, Equine Keeping, Oil Drilling Overlay District) to [T][Q]M3-1-0 (Heavy Industrial, Height District No. 1, Oil Drilling Overlay District).

Conduct a public hearing on the Added Area to amend the Granada Hills-Knollwood Community Plan from "Open Space" to "Heavy Industrial" and amendments to other applicable elements of the General Plan.

Certify, pursuant to California State Public Resources Code § 21082.1, Subd. (c)(3) and CEQA Guidelines § 15090, that the Final Subsequent Environmental Impact Report (FSEIR) (State Clearinghouse No. 92041053), prepared by the City of Los Angeles as the lead agency, is adequate for matters related to the Sunshine Canyon Landfill which is before the City as the responsible agency, that the Report reflects the independent judgment of the lead agency, that the information has been reviewed and considered prior to approving the proposed project, and Transmit the FSEIR to the City Council for consideration and appropriate action.

Approve, pursuant to California State Public Resources Code § 21082.1, Subd. (c)(3) and CEQA Guidelines § 15090, that the Addendum dated February 5, 1999, prepared by the City of Los Angeles as the lead agency, is adequate for matters related to the

Added Area adjacent to the Sunshine Canyon Landfill which is before the City as the responsible agency, that the Addendum reflects the independent judgment of the lead agency, that the information has been reviewed and considered prior to approving the proposed project, and Transmit the Addendum to the City Council for consideration and appropriate action.

Approve and Recommend that, pursuant to the California State Public Resource Code § 21081.6 and CEQA Guidelines § 15091(d), the Council adopt the Mitigation Monitoring and Reporting Program (Exhibit No. E-10) prepared for the proposed project and designed to ensure compliance during project implementation, as amended pursuant to the conditions of approval (Conditions, Section No. 4), as amended by Exhibit E-9B.

Recommend that the Local Enforcement Agency and other responsible agencies review the Mitigation Monitoring and Reporting Program (MMRP) to coordinate implementation of the mitigation measures and advise the permittee on revisions to the MMRP.

Approve the California Environmental Quality Act Findings (Findings, 3) and the Statement of Overriding Considerations Exhibit E-10).

Deny the requests as filed.

Approve and Recommend that the Mayor approve and the City Council adopt the attached Plan Resolutions (Exhibit Nos. E-11A and E-11B), and the following amendments to the Granada Hills-Knollwood Community Plan:

- Amend the General Plan map by adding the "Heavy Industrial" land use designation to the map legend with "M3" as the corresponding zone.
- Amend the General Plan map as shown in Exhibit E-5B, from "Open Space" to "Heavy Industrial" for 394 acres of the Sunshine Canyon Landfill site and the 5-acre Added Area.
- Amend the General Plan map by modifying Footnote No. 8 as follows:

Delete the following: "Browning-Ferris Industries' existing privately-owned access road is understood to be for truck traffic for closure uses and to access the adjacent landfill operations in the unincorporated portion of the Los Angeles County, in accordance with ZA 94-0753(ZV)."

Delete the following: "Such uses shall not be permitted during the closure period; and the property shall not be available for public recreation purposes until application for a certificate of closure has been accepted."

Add the following: "The area, as described in Recorded Document No. 83-43175 (Director's Deed, May 1982) and as identified in Exhibit No. E-8 (Addendum) of CPC 98-0184(ZC/GPA), shall function as a natural buffer area between the landfill and surrounding uses."

Amend the map by placing a Landfill symbol on the subject site.

Authorize the Department of Planning to present the Resolutions and Plan Amendments to the Mayor and City Council, in accordance with Section 96.5 of the City Charter.

Approve and Recommend that the Mayor approve and City Council adopt the zone change from "A1-1-K-0" (Agricultural, Height District No.1, Equine Keeping, Oil Overlay District) to "[T][Q]M3-1-0" (Heavy Industrial, Height District No. 1, Oil Drilling Overlay) classification, as identified in Exhibit No. E-6B, subject to the attached [T] and [Q] conditions.

Instruct the Department of Planning to prepare the necessary ordinances changing the zone classifications.

Approve the attached City Charter, Zone Change, and Additional Findings (Findings, Section No. 3)

Advise the applicant that:

1. Pursuant to California State Public Resources Code § 21081.6 and CEQA Guidelines § 150919(d), as amended by City of Los Angeles Policy Memorandum No. 91-1, June 1992, the City will monitor or require evidence that any mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring.
2. Pursuant to State and Fish and Game Code Section 711.4, a Fish and Game Fee and/or Certificate of Fee Exception is required to be submitted to the County Clerk prior to or concurrent with the environmental Notice of Determination (NOD) filing.

CONDITIONS OF APPROVAL

- Section No. 2

**CONDITIONS FOR CLEARANCE OF PERMANENT [T]
CLASSIFICATION RELATING TO
THE PROPOSED PROJECT**

Provisions of the following will clear the conditions for the Permanent Classification or by posting of guarantees satisfactory to the City Engineer to assure the following without expense to the City of Los Angeles, with copies of any approvals or guarantees provided to the Planning Department for attachment to the subject City Plan Case file.

Covenant. Prior to the issuance of any permits relative to this matter, an agreement covenanting with the City to comply with all the information contained in these conditions shall be recorded by the property owners in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent owners, lessees, heirs or assigns. Furthermore, the agreement shall be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be given to the City Planning Department for attachment to the subject file.

1. Construct, as of necessary, sewer facilities to the satisfaction of the City Engineer.
2. Construct, as necessary, drainage facilities to the satisfaction of the City Engineer.
3. Prepare a parking area and driveway plan to the satisfaction of the appropriate District Office of the Bureau of Engineering and the Department of Transportation.
4. Prepare a plot plan to the satisfaction of the Fire Department including but not limited to access and interior heat sensitive sprinkler system.
5. Provide street dedications and improvements to the satisfaction of the City Engineer and include the following:
 - a. Roxford Street at the I-5 Freeway, (SB ramp). Prior to operating under the subject approval, restripe westbound approach on Roxford Street to provide dual left-turn lanes and one through lane.

(MMRP Mitigation Measure No. 136)

- b. Roxford Street at the Encinitas/I-5 Freeway (NB ramp). Prior to operating under the subject approval, restripe northbound approach on Encinitas Avenue to provide left-turn lane, shared through/left-turn lane, and shared through/right-turn lane. (MMRP Mitigation Measure No. 137)
- c. Prior to operating under the subject approval, contribute, in a "fair share" amount as determined by the Los Angeles Department of Transportation, to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. (MMRP Mitigation Measure No. 139).
- d. San Fernando Road at Sierra Highway Restripe northbound approach on San Fernando Road. Prior to operating under the subject approval, provide a shared through/ right-turn lane and exclusive right-turn lane and restripe the westbound approach of Sierra Highway for a 12-foot-wide curb lane. (MMRP Mitigation Measure No. 140).
- e. San Fernando Road at Project Driveway. Prior to operating under the subject approval, install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. (MMRP Mitigation Measure No. 141).
- f. The required street improvements and signal modifications shall be guaranteed prior to operating under the subject approval, through the B-permit process of the Bureau of Engineering,

Department of Public Works, and the encroachment permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of LADOT, the Bureau of Engineering, and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, to arrange a pre-design meeting to finalize the proposed geometric and traffic signal designs for the project. (MMRP Mitigation Measure No. 142).

- g. **Parking and Safety Concerns.** Prior to operating under the subject approval, install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. (MMRP Mitigation Measure No. 143).
- h. **Bicycle Routes.** The following mitigation measure is proposed by the project proponent to address any potential localized impact along the San Fernando Road bicycle lane from increased truck traffic at or near the project site (MMRP Mitigation Measure No. 144):
 - 1) Signs acceptable to the City shall be posted at or near the entrance to the landfill facility. These signs shall caution the public that heavy truck traffic exists in the area.
 - 2) **Divert Trips.** If the landfill regularly meets its weekly and/or daily maximum limit, the permittee shall implement a program to avert wasted trips to the landfill and illegal disposal. The program shall include:
 - a) Scheduling of regular users, such as

commercial and municipal haulers, to avoid them from arriving at the landfill and being diverted to other landfills;

- b) Reservation of capacity for small commercial and private users, unless an alternate landfill located within 5 miles of the applicant's landfill is available to accept such users.

- 6. Install street lights to the satisfaction of the Bureau of Street Lighting.

**[Q] QUALIFIED
CONDITIONS OF APPROVAL**

Sec. 2 Pursuant to Section 12.32-K of the Los Angeles Municipal Code the following limitations are hereby imposed upon the use of that property shown in Section 1 hereof which is subject to the Permanent [Q] Qualified Classification.

A. Administrative

1. Covenant. Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assigns. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department.
2. Approval verification and submittal. Copies of any approvals, guarantees or verification of consultations, reviews or approvals, plans, etc., as may be required by the subject conditions, shall be provided to the Planning Department for placement in the subject file.
3. Definition. Any agency, public official, or legislation referenced in these conditions shall include agencies, public officials, legislation or their successors, designees or amendments to any legislation. Unless otherwise apparent from the context, the term "permittee" shall include the applicant and any other person, corporation, or other entity making use of this approval.
4. Enforcement.
 - a. Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any other designated agency, or the agency's successor in accordance with any stated laws or regulations, or any amendments thereto including but not limited to those permits issued by the following agencies:
 - 1) The Local Enforcement Agency (i.e., Los Angeles Environmental Affairs Department and/or Organization/Committee designed under a joint powers agreement or other instrument)

and the California Integrated Waste Management Board;

- 2) The Los Angeles Regional Water Quality Control Board;
- 3) The South Coast Air Quality Management District;
- 4) The California Department of Fish and Game;
- 5) The U.S. Army Corps of Engineers; and
- 6) The State Department of Health Services.

b. Failure of the permittee to cease any development of activity that is not in full compliance shall be a violation of these conditions.

c. To the extent permitted by Public Resources Code Section 45005, the Local Enforcement Agency shall have the authority to order the immediate cessation of landfilling or other activities at the site, if it determines that the inhabitants of the City are under imminent and substantial risk to health, safety, or welfare. Such cessation shall continue until such time as the Local Enforcement Agency determines that the conditions leading to the cessation have been eliminated or reduced to a level which no longer poses an unacceptable threat to such health, safety, or welfare.

5. Plan. The subject property shall be developed substantially in conformance with Exhibit No. E-4B, attached to City Plan Case No. 98-0184(ZC/GPA)(MPR), and subject to the conditions of approval contained herein. Upon review of the Local Enforcement Agency and approval of the Planning Department, minor deviations from the conditions may be allowed in order to comply with provisions of the Municipal Code and the intent of the subject permit authorization.

6. Annual Reports. The permittee shall submit annual reports to Department of City Planning Department. The reports shall include, but not be limited to, Hotline/Emergency Log summaries, daily tonnage figures, readings and analysis of the effectiveness of landfill gas monitoring activities, noise measures, discussion on litter prevention, and overall compliance with the

conditions of the subject approval.

7. Revised Mitigation Monitoring and Reporting Program (MMRP). The permittee shall submit a revised Mitigation Monitoring and Reporting Program ("MMRP") satisfactory to the Department of City Planning that incorporates all mitigation measures required in the Final SEIR (State Clearinghouse No. 92041053) as amended by this action. The Applicant shall also identify mitigation monitor(s) who will provide annual status reports as noted above and in the MMRP, beginning immediately at commencement of the operation until five years after commencement of Phase II of the operation. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, operation, closure, and post-closure) to ensure continued implementation and adequacy of the mitigation measures.

The permittee shall hire an independent consultant to provide technical expertise and consultation services to assist in the implementation of the MMRP and shall provide technical assistance for the duration of the project which would otherwise not be available to the MMRP responsible agencies. Selection of the independent consultant shall be approved by the City Planning Department and Local Enforcement Agency.

Mitigation and Monitoring Program. Attached to these conditions is a Mitigation and Monitoring Program (Exhibit No. E-9) which is hereby incorporated into these conditions. The permittee shall fully perform each action required of the program as if it were specifically set forth in these conditions.

8. Bond. Performance bonds or letters of credit stating the amount, duration, and supervisory agency shall be established. Prior to commencing construction of the landfill, a bond in the minimum amount of \$3,000,000 shall be provided to the Director of Planning to finance litter, traffic, and community protection program mitigation measures not responded to by the permittee in a timely and reasonable manner.
9. Agreements. To provide for the joint operations and monitoring, and mitigation of the landfill, the permittee shall submit agreements entered into with the City and County of Los Angeles by Memorandum of Understanding, Development Agreement, Joint Powers Agreement, or other instruments related but not limited to the following:

- a. Joint Working Agreement including shared operation and enforcement of a Combined City/County Landfill.
- b. Establishing City/County rights to use the landfill and/or related capacity allocations.
- c. Tipping charges, Gas-to-energy or direct gas sales, or other fee and bond arrangements with the City.
- d. Environmental Education or Community Amenities Programs.
- e. Evidence of compliance with the Closure Plan for the Inactive City Landfill.

B. Conditions on Use.

1. Limitation on Uses: Permitted uses are the approved landfill footprint, ancillary, closure, post-closure, and existing uses. Prohibited uses are other industrial and commercial uses permitted in the M3 zone classification which are not listed in the subject approval and fully described below.
2. Approval. The subject approval is for the development, operation, maintenance and monitoring of a Class III, non-hazardous solid waste "Immediate Combined City/County Landfill", that may be designed to share environmental control systems (e.g. landfill liner, leachate collection, and removal system, landfill gas extraction and flaring system), with shared use of the access road, scales, administrative offices, and other ancillary uses.
 - a. As used in this condition, "landfill" refers to the portion of the subject property in which waste is to be permanently placed and then buried under daily and interim cover material, but excludes adjacent cut slopes, temporary storage areas and ancillary facilities authorized by this action. The restrictions of this condition do not apply to final cover which may be added as pursuant to closure plans. Allowance for settlement of fill shall not be made in determining compliance with this condition.
 - b. Landfill footprint. The footprint of the landfill within the City shall not exceed approximately 194 acres and provide an estimated net airspace disposal capacity of 55 million tons in the City. The City Landfill footprint and other M3 listed

uses shall be setback 500-feet from any less restrictive zone.

c. Ancillary Uses and Facilities. The subject property may only be used for the following ancillary uses and facilities. These ancillary uses and facilities are described in the July 1997 Draft Subsequent EIR, pages 2-38 through 2-43, and may be located on the applicant's property generally in conformance with the diagram attached as Exhibit E-4 and during the life of the landfill, may be moved or relocated following commencement of landfilling operations as necessary to accommodate development of the ultimate landfill footprint.

- 1) Access roadway;
- 2) Administrative offices and employee facilities related directly to the landfill and waste handling and processing operations allowed under this approval, but excluding offices and other facilities related to any other enterprises operated by the applicant or others;
- 3) Caretaker's residences or mobile homes;
- 4) Environmental learning center;
- 5) Scale house, check-in and general maintenance areas;
- 6) Plant materials center (i.e., nursery facility);
- 7) Facilities necessary for the environmental protection and control systems/features, including flaring stations, leachate treatment, storage tanks, sedimentation basins, water storage tanks and optional tanks;
- 8) Leachate collection and processing facilities;
- 9) Facilities necessary for the collection, disposal, utilization and distribution of landfill gases as required and/or approved by the South Coast Air Quality Management District;

- 10) Facilities necessary for the maintenance of machinery and equipment employed at the landfill, excluding equipment or machinery utilized by the applicant in other enterprises, including refuse collection;
 - 11) Closure and post-closure activities of the existing inactive and proposed City Landfill; and
 - 12) Open Space uses such as recreational, wildlife habitat or corridor, or scenic parkland.
- d. Phasing. The permittee is permitted to fill in two phases. For each phase, the permittee shall provide proof of compliance with the conditions of approval, facility plans, including pre-disposal topography of the site, the facility boundary of the site (clearly illustrating parcels owned by the operator and/or any parcels leased), the total permitted acreage of the site, the acreage of the disposal area, filling sequencing and excavation plans, the extent of any M3 buffer zones between the disposal area and permitted property boundaries provided by the facility layout, and the vertical limits of the site. The Local Enforcement Agency and Planning Department shall coordinate review of the plans.
- 1) Phase I. (Phase I of the operation is described as Sequence A on p. 2-24 of the Draft SEIR.) The initial sequence of landfilling operations is permitted within the western portion of the project site, abutting and overlapping existing fill areas of the existing inactive landfill (larger fill area) located near the City/County jurisdictional boundary. (Refer to Exhibit 4B). Sequence A may encompass approximately 72 acres within the City and 24 acres in the County. Base grading elevation in Sequence A would commence at approximately 1,575 feet MSL near the existing inactive landfill. Final fill elevations in Sequence A would range from 1,777 to up to 2,000 feet MSL at the top deck of the landfill footprint. The maximum volume capacity shall not exceed 16 million tons.
 - 2) Phase II. Upon reaching the capacity of Phase

I and after the determination of the Director of Planning, with the assistance of the Local Enforcement Agency, that there is compliance with the following, the permittee will be permitted to proceed to Phase II:

- a) At least three years of landfill operation under this approval;
- b) Compliance with the conditions of the subject approval;
- c) Obtain all appropriate permits and agreements from Los Angeles County for operation of the City/County operation as stated in Condition No. A.9;
- d) Evidence of compliance with the Closure Plan, as determined by the Local Enforcement Agency, for the Inactive City Landfill; and
- e) Submittal of annual reports in a timely manner.

Phase II, the ultimate City/County Landfill shall not exceed a net disposal capacity of 55 tons in the City Landfill and 90 million tons in the City/County landfill. The maximum vertical height of the landfill footprint at buildout would result in final fill elevation (at its top deck areas) of 2,000 feet MSL, as shown in Exhibit E-4B.

2. Hours of Operation. The hours of operation for landfill activities shall be as follows:

- a. The landfill shall be closed on Sunday;
- b. Refuse may be accepted at the landfill scales between the hours of 6:00 a.m. (Scales open) through 6:00 p.m. (Scales close), Monday through Friday, and 7:00 a.m. to 2:00 p.m. on Saturday however, that the landfill entrance gate at San Fernando Road will open at 5:00 a.m. on weekdays and 6:00 a.m. on Saturdays to allow the onsite queuing of vehicles. Further, that refuse or dirt may be accepted at other times, if the Local Enforcement Agency determines that extended hours

are necessary to handle emergency disposal for the preservation of the public health and safety;

- c. Landfill operations such as site preparation and maintenance, the application of cover, and waste processing, but excepting activities such as gas control which require continuous operation, shall be conducted between the hours of 6:00 a.m. and 9:00 p.m., Monday through Saturday;
 - d. Equipment maintenance shall be limited to the hours of 4:00 a.m. through 9:00 p.m., Monday through Saturday;
 - c. Mitigation and emergency operations which cannot be accomplished during the hours stated above may be performed at any time in compliance with 3c.
3. Intake Rate. The average, maximum, or emergency tonnage rates allow the permittee to adjust disposal between the City and County, but can not exceed the maximum permitted for the Combined City/County Landfill:
- a. Net tonnage. The average net tonnage placed in the Combined City/County Landfill shall not exceed an average waste intake rate of 11,000 tons in any given day (based on an intake rate of 5,000 tpd in the City and the currently authorized average intake of 6,000 tons per day in the County) with a maximum weekly capacity of 66,000 tons, based upon 6 working days per week.
 - b. Maximum Waste Intake Rate. The maximum tonnage of waste placed in the landfill shall not exceed 12,100 tons on any given day (based on a maximum intake rate of 5,500 tpd in the City and the currently authorized average intake of 6,600 tons per day in the County) with a maximum weekly capacity of 66,000 tons, based upon 6 working days per week. The maximum daily intake rate may include 1,100 tpd of inert material.
 - c. Emergency as defined in CCR Title 14, Division 7, Chapter 3, Article 3 (Emergency Waiver of Standards). The City Council or Mayor may increase the net tonnage allowed upon the joint recommendations of the Local Enforcement Agency, Department of Public Work, Bureau of Sanitation, and Planning Department, if there is a declared emergency and if it is determined that an increase

is necessary to appropriately manage the City's waste stream for the protection of the public health and safety.

d. Net tonnage shall not include:

- 1) Clean dirt imported to cover and prepare interim and final fill slopes for planting;
- 2) Waste processed and put to a beneficial use on the landfill or separated or otherwise diverted from the waste stream and exported from the landfill for the purpose of recycling, in accord with the restrictions of Condition No.5, and pursuant to the provisions as entered into pursuant to Condition No. A.9.

4. Prohibited Waste. The following types of waste shall be considered unacceptable waste for disposal in the landfill:

- a. Incinerator ash, sludge, radioactive material, hazardous waste, and medical waste as defined in Section 25023.2 of the California Health & Safety Code shall not be accepted. Should such waste be nevertheless received at the landfill, it shall be handled and disposed of as provided in Condition No. 4.c.
- b. The permittee shall implement a comprehensive waste load checking program to exclude disposal of Unacceptable Waste, which complies with the requirements of the subject condition, the Mitigation Monitoring and Report Program, additional requirements of the Local Enforcement Agency, the State Department of Health Services, and the Regional Water Quality Control Board.
- c. Restrictions on disposal of Unacceptable Waste and the procedures for proper disposal at other appropriately classified disposal sites for waste processing facilities shall be provided to waste haulers on a routine basis. Notices shall also be posted at prominent locations at the landfill to inform waste haulers of the rules governing the disposal of Unacceptable Waste.

In the event that material known or suspected to be Unacceptable Waste is discovered at the landfill,

the permittee shall:

- 1) If the vehicle that delivered the waste is still present, detain the driver and obtain his drivers license and vehicle license number;
- 2) Immediately make all required notifications to City, State, and County agencies;
- 3) If possession of the material is not immediately taken by a public official, store the material at a site developed in accord with the regulations of the State Department of Health Services and the Regional Water Quality Control Board until disposed of in accord with applicable State and Federal regulations.

d. Nothing in this condition shall be construed to permit the creation or use of a hazardous waste disposal facility at the landfill.

5. Waste Diversion.

- a. Notwithstanding any other provision of this action, the permittee shall not knowingly deposit waste into the landfill which is required to be diverted or recycled in accord with City and County Source Reduction and Recycling Elements, the County Integrated Waste Management Plan adopted pursuant to Division 30 of the Public Resources Code, City Reduction and Recycling Plans, and the agreement entered into pursuant to Condition No. A.9.
- b. The permittee shall maintain on-site waste diversion and recycling facilities consistent in scope and purpose with the agreement entered into pursuant to Condition No. A.9.

6. Ceased Operation.

- a. Landfilling operations consisting of the collection and disposal of waste shall terminate upon completion of the approved City fill design, as conceptually shown on Exhibit E-4B, and as further described in Condition No. B.2.d.2. Upon the completion of the fill design, no further waste shall be accepted for filling or processing. However, the applicant is authorized to continue

such facilities in operation as are necessary to complete mitigation measures required by this approval or for closure or post closure maintenance required by federal, state and local agencies. All facilities not required for mitigation, closure or post closure maintenance shall be removed unless they are of a type permitted by the zoning regulations then in effect.

- b. Upon cessation of waste disposal operations, the permitted uses are limited to closure, post-closure, and open space.
- c. Upon completion of the post-closure period, the property owner shall contact the City Department of Recreation and Parks, Santa Monica Mountain Conservancy for their consideration of the site for parklands.

C. Conditions on Development, Design, and Operation.

- 1. Mitigation Monitoring and Reporting Program (Exhibit No. E-9) is hereby incorporated into these conditions. The permittee shall fully perform each action required of the program as if it were specifically set forth in these conditions.
- 2. Community Protection Program. A community protection program shall be established that includes the following:
 - a. Preparation and distribution of an annual newsletter to all parties on the Interested Parties List established for the City Planning Commission February 25, 1999 meeting. The quarterly newsletter shall include a summary of Hotline/Emergency Log activity of the period as well as progress report on the landfill operation. The Hotline and 24-hour emergency phone numbers shall be publicized in each issue of the newsletter.
 - b. The permittee shall maintain a Hotline/Emergency Log which shall record complaints as well as follow-up actions.
 - c. The permittee shall post a sign at the entry gate at San Fernando Road which indicates the following:
 - 1) The telephone number by which persons may on a 24 hour basis contact the permittee to register complaints regarding landfill

operations.

- 2) The telephone number of the Local Enforcement Agency and the hours when the number is manned.
 - 3) The telephone number of the enforcement offices of the South Coast Air Quality Management District and the hours when the number is manned.
- d. The permittee shall at all times, between the hours of 6:00 a.m. and 9:00 p.m., Monday through Saturday, maintain adequate staff to promptly respond to litter and other complaints from the surrounding neighborhood.

At all other times, the permittee shall maintain on-site at least one person who is qualified to assess the need for remedial action and is authorized to summon the resources to perform any necessary remedial action. The personnel assigned shall be provided with the means to be continuously in response to the telephone number posted at the entry gate.

3. Fugitive Dust. The permittee shall utilize the most effective available technology and methodology to avert fugitive dust emissions which may be a nuisance or hazard in adjacent populated or recreational areas or cause significant damage to wildland resources. In addition to the revegetation measures required in the Mitigation Monitoring and Reporting Program, the program shall include the following:
 - a. The permittee shall not engage in any excavation or other operation during high wind conditions, or when such conditions may reasonably be expected, that would result in significant emissions of fugitive dust which cannot be confined to the area under the permittee's control.
 - b. Working faces shall be kept to small contained areas of approximately 2 to 3 acres and, at times of the year when high wind conditions may be expected, shall be located within areas of minimal wind exposure.
 - c. Daily cover shall be moistened with water. A soil sealant shall also be used as necessary to

supplement water for dust control and to retard erosion when wind conditions dictate.

- d. Any active area or active cover soil stockpile shall be moistened with water on a daily basis unless wind conditions dictate otherwise, in which case soil sealant shall be used in addition to water. Material cut from one portion of the site shall be used as a cover material in an adjacent area, to the extent feasible, to reduce the transport distance.
- e. Before each day when the landfill will be closed to refuse receipt, the permittee shall apply soil sealant to any previously active dirt area which has not already been sealed or revegetated.
- f. Inactive areas of exposed dirt that have been sealed shall be regularly monitored to determine the need for additional sealing and to prevent unauthorized access that might disturb the sealant and, if additional treatment is required, it shall be promptly applied to assure full control of the soil particles.
- g. All access roads to permanent facilities, excepting those infrequently used, shall be paved.
- h. The paved access road to the fill areas shall be extended as new areas are opened to minimize the length of dirt road.
- i. All paved roads in regular use shall be regularly cleansed to remove dirt left by trucks and other vehicles.
- j. All dirt roads in regular use shall be watered at least once daily on operating days and more often as needed or otherwise treated to control dust emissions.
- k. Loads capable of producing significant dust shall be watered during the dumping process, if such a practice is deemed acceptable to the Regional Water Quality Control Board.
- l. The permittee shall maintain water tanks and piping capable of supplying by gravity at least one full day's maximum water usage to the fill areas for dust control, which capacity shall be in addition

to any fire flow requirements.

- m. The permittee shall install and maintain devices to monitor wind speed and direction, as specified by the South Coast Air Quality Management District, and shall retain qualified personnel to read and interpret the data, to obtain or utilize information on predicted wind conditions and to assist in the planning of operations at the landfill.
4. Grading. Except as otherwise provided in this condition, areas outside of and above the cut and fill shown on Exhibit No. E-4B or revised approved exhibit, shall not be graded or similarly disturbed. The Department of Building and Safety, in consultation with the Planning Department, may approve additional grading, if determined, based upon engineering studies provided by the permittee and independently evaluated by these Departments, that such additional grading or disturbance is necessary for slope stability or drainage purposes. Such a determination shall be documented and provided in the annual reports as part of the attached monitoring program.

No approval shall be granted under this condition which will result in expanding the area or height of fill or in lowering or significantly modifying any of the ridgelines surrounding the landfill.

Nothing in this condition shall be construed as prohibiting the installation of water tanks, access roads, flares, or similar facilities or mitigation programs required by this action or by permits issued by other public agencies.

5. Graffiti removal and deterrence on building and structures in public view. The property owners and all successors shall acknowledge the applicability of the graffiti removal and deterrence requirements pursuant to Municipal Code Sections 91.8101-F, 91.8904.1 and 91.1707-E relative to the subject project, particularly with regard to the following:
- a. The first nine feet of exterior walls and doors, measured from grade, and all of any walls enclosing the property shall be built and maintained with a graffiti resistant finish consisting of either a hard, smooth, impermeable surface such as ceramic tile, baked enamel or a renewable coating of an

approved, anti-graffiti material or a combination of both pursuant to Section 91.1707-E; and

- b. the period for compliance with a graffiti removal order issued by the Building and Safety Department is 15 days following which period with failure to perform, the City or its contractor is empowered to enter the property to remove such graffiti with costs accruing to the property owner (91.8904.1); and
 - c. the period for compliance with a subsequent order for a subsequent occurrence is three days (91.8904.1.).
 - d. In addition to a,b, and c above, exterior walls of new buildings of other than glass may be covered with clinging vine, screened by oleander trees or similar vegetation capable of covering or screening entire walls up to the height of at least 9 feet, excluding windows and signs.
6. Litter. The permittee shall employ the most effective available technology and methodology to prevent litter which enters the area under the permittee's control in the form of waste from escaping the area. Notwithstanding other provisions of this condition or of this action, the permittee shall close the landfill to incoming waste during high wind conditions if, despite the application of the most effective available technology and methodology, litter cannot be confined to the area of the permittee's control. The permittee's on-site litter control program shall include, unless otherwise provided by the City Planning Department, the following:
- a. Landfill personnel shall continuously patrol the access road to the scales from the time it opens to the time it closes in the evening.
 - b. Improperly covered or contained loads which may result in a significant release of litter shall be immediately detained and the condition corrected, if practicable, before the load proceeds to the working face. If correction cannot be made, the load shall be conducted under escort to the working face.
 - c. All debris found on or along the entrance and working face access roads shall be immediately

removed.

- d. Operating areas shall be located in wind shielded portions of the landfill during windy periods.
- e. The permittee shall use a primary litter fence at a height of eight feet at the working face, a secondary fence of four feet behind the primary fence, and depending on wind conditions, another four-foot high fence behind the secondary fence. Also, on windy days and when the fences are not sufficient, the working face shall be moved up against a slope so that debris can be more easily contained.
- f. The permittee shall, to the satisfaction of the Planning, maintain programs aimed at controlling the discharge and recovery of litter from uncovered or improperly covered or contained loads traveling to the landfill.

The measures shall include an effective tarping program, which if necessary in the estimation of the Local Enforcement Agency, shall provide for mandatory sale of tarps to violators and/or exclusion from the landfill of repeated violators. Also, a message shall be placed on the facility public telephone stating the requirement to tarp loads.

7. Oak trees.

- a. Except where necessary to carry out testing required to obtain permits, no oak trees shall be removed within the City until the permittee has obtained all permits necessary from appropriate City agencies to begin initial site development.
- b. Except for initial site clearance and as necessary for slope stability, cover stockpile, drainage, flare installation or fire suppression or other ancillary facilities, oak trees and other native vegetation more than 50 feet above the working elevation of the landfill shall not be removed.
- c. These conditions are intended to control the rate of oak tree removal and shall not be construed to allow the disturbance of areas not authorized for disturbance pursuant to the approved conditions.

8. Revegetation. The project proponent shall submit a

revegetation plan consistent with the MMRP:

- a. Final cut slopes shall not exceed an overall incline of 1.5:1.
 - b. If the Local Enforcement Agency determines that a different design or plan would better protect the public health and safety and would enable revegetation of the final slopes as well or better than the design or plan described in Exhibit No. 4.B, and/or a change is dictated by revisions to the minimum standards adopted by the California Integrated Waste Management Board, and the LEA, therefore, directs the implementation of a different design and/or plan, the applicant shall not be bound by the provisions of this condition; provided, however, that the maximum elevations and area of fill may not exceed that permitted in Condition No. B.2.d.
 - c. A temporary vegetation cover shall be established on all slopes and other areas that are to remain inactive for a period longer than 180 days.
 - d. The applicant shall employ expert assistance to carry out this condition, including an independent, qualified biologist. Soil sampling and laboratory analysis shall be conducted on all areas before revegetation to identify chemical or physical soil properties that may adversely affect plant growth and establishment. Soil amendments and fertilizer recommendations shall be applied and plant materials selected based upon the above-referenced testing procedures and results. To the extent possible, as determined by the LEA, plant types shall blend with species indigenous to the area and be drought tolerant and shall be capable of rapid establishment.
9. Riparian habitat. The permittee shall replace disturbed riparian habitat to the satisfaction of the California Department of Fish and Game and the U.S. Army Corps of Engineers in accordance with plans approved before commencement of landfill development. Replacement habitat shall be provided on a 2:1 ratio through a program of tree planting streamzone stabilization, stream enlargement and/or streamzone rehabilitation in degraded drainage channels. The program shall also provide mitigation sufficient to prevent any net loss of wetland. Preference shall be given to habitat mitigation in the

immediate vicinity of the landfill or an urbanized area whereby providing outdoor experience and education within proximity of a larger population. Final site selection and the review of detailed engineering plans and working drawings shall be coordinated among the responsible agencies.

- D. Notice. Notice is hereby given that pursuant to the Section 12.27.1 (Administrative Nuisance Abatement), the City Planning Commission or Zoning Administrator, after conducting a public hearing, may revoke or modify this approval, if the Commission or Zoning Administrator find that these conditions have been violated or that this approval has been exercised so as to be detrimental to the public health or safety or so as to be a nuisance.

FINDINGS

- Section No. 3

GENERAL PLAN FINDINGS

1. **Substantial Conformance with the General Plan.** (City Charter, Section 96.5(5): The recommended action, to amend the general plan by changing the designation from "Open Space" to "Heavy Industrial" and the associated zone change from "A1-1-K-O" to "M3-1" on portions of the subject site, is in substantial conformance with the purposes intent, and provisions of the general plan and elements of the General Plan in that:

- A. **Granada Hills-Knollwood Community Plan.**

Background to the Community Plan. In 1996, an amendment to the General Plan changed the designation on the subject site and Added Area from "Minimum" residential to privately owned "Open Space", with no change in the underlying A1-1-K-O zone classification. The Open Space designation for privately owned land is to protect and preserve natural resources and natural features of the environment, such as wildlife refuge and preservation areas; to encourage the management of private lands in a manner which protects the environmental characteristics; and to conserve large parcels which are essentially unimproved.¹ The Plan also indicates that Open Space areas be preserved and conserved from encroachment by inconsistent uses.

Footnotes were added to the Community Plan map identifying three milestones in the use of the subject site (i.e., active landfill from 1958 to 1991, permitted operation pursuant to zone variances, and its pending closure).

During the 1996 Community Plan revision proceedings, the amendment on the subject site from Minimum Residential to Open Space was justified for several reasons, including the fact that residential development authorized by the Minimum designation was unlikely to occur within the next 20 years due to landfill closure and post-closure activities, current entitlements would not be altered by the amendment, and the Open Space designation would not preclude the property from applying for a general plan

¹ Granada Hills-Knollwood Community Plan, City of Los Angeles, Department of Planning, pg. 15, Adopted by City Council on July 10, 1996.

amendment or zone change. ²

Conformance to the Community Plan. The Los Angeles Municipal Code only permits privately operated landfills in the M3 zone classification and a M3 zone is a corresponding zone to the "Heavy Industrial" general plan designation. The current general plan designation is "Open Space", and therefore the proposed project is not consistent with the map designation. However, the recommended action, to amend the plan including general plan map, is in conformance with the intent and purposes of the Plan as identified by the following Plan objectives:

- 1) *To coordinate the development of Granada Hills-Knollwood with that of other parts of the City and metropolitan area in that the recommended action will allow the expansion of the landfill to provide for the long-term solid waste disposal capacity of the community and the City of Los Angeles.*
- 2) *To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010 in that the recommended action will allow the expansion of the landfill to accommodate the solid waste disposal needs of existing residential, commercial, and industrial land uses and for the future growth of the community and City of Los Angeles.*
- 3) *Provide for the location and programming of public services and utilities and coordinate the phasing of public facilities with private development in that the recommended action will allow the expansion of a privately operated landfill consistent with several comprehensive solid waste facility studies including: the City of Los Angeles Source Reduction and Recycling Element (City SRRE), the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), the City of Los Angeles Solid Waste Management Plan, the County and City Solid Waste Management Action Plan(s), the Solid Waste Management and Disposal Options in Los*

²

Supplemental Report - Amendments to CPC 94-0356 (CPR) City Planning Commission Report, January 26, 1995.

Angeles County, the Integrated Solid Waste Management System for Los Angeles County, the Los Angeles County Countywide Siting Element (CSE), the County of Los Angeles Source Reduction and Recycling Element, and the Los Angeles County Countywide Integrated Management Plan.

- 4) Encourage open space for recreation uses and promote the preservation of views, natural character, and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region in that the recommended action would allow the landfill expansion in area that does not adversely impact the open space character of the surrounding residential. The natural character and topography of the perimeter ridgelines and the proposed 100 acre buffer to the south are views enjoyed by the surrounding community. The buffer area is planted with over 10,000 trees including 1,367 coastal live oaks trees. Conditions of approval ensure revegetation programs to establish a native oak woodland community to enhance the natural character of the area. In addition, as part of the County CUP approval, the project proponent is setting aside land as open space.

Lastly, the Code requires the industrial uses of a landfill to occur within the inner M3 which is a 500-foot buffer around the perimeter of the landfill operation. This area will provide additional visual and noise buffer for the residential community to the south and recreational area to the west.

Relationship to the Added Area. The recommended action, to amend the general plan designation of the Added Area from Open Space to Heavy Industrial, is to avoid creating an island of the most restrictive land use designation surrounded by the least restrictive Community Plan designation. The permittee cannot locate the landfill footprint less than 500 feet from the Added Area.

The recommended action does not create an industrial/residential conflict because it is not reasonably foreseeable that the Added Area will be developed. According to Chicago Title, it appears that the property has not been insured by a title company. It is landlocked and has remained vacant and unused since

1927. It was purchased with full knowledge of its lack of access. In fact, the Director's Deed (83-431375) states, "There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway. The above-described real property is landlocked and without any direct access to the freeway or any public or private road. The State of California is without obligation or liability to provide access to the said real property."

Relationship to 100 Acre Buffer: The buffer area will retain its current "Open Space" designation with A1-1-K-0 zone classification.

B. Open Space Plan

Background of the Open Space Plan. The City's Open Space Plan map designates the subject site and Added Area as "Desirable Open Space."³ The Plan defines "Desirable Open Space" as: "... land which possesses open space characteristics which should be protected and where additional development controls such as proposed in this Plan are needed to conserve such characteristics. These lands may be either publicly or privately owned. Conservation of such characteristics is needed to insure the usefulness, safety and desirability of adjacent lands, and to maintain the overall health, safety, welfare and attractiveness of the community".⁴

The Desirable Open Space designation, as applied to the subject site and Added Area, indicates lands where appropriate regulatory measures should be taken to ensure continued maintenance of the open space character or to ensure that development does not conflict or destroy its open space character. The designation, goals, objectives, policies, and programs of the Plan are directed toward the regulation of privately owned lands both for the benefit of the public and for protection of individuals from the misuses of these lands.

It is stated in the Plan that "It is not the intent of this Plan to prohibit development of desirable open space

³ As shown on the map, City Plan Case No. 24533, adopted June 1973. It is noted that landfill disposal on the subject site began in March 1958 and ended April 1991.

⁴ Open Space Plan, pg. 2

if such development or desirable open space is consistent with the unique characteristics of land so designated."⁵

Conformance to the Open Space Plan. The applicant has requested an amendment to the Open Space Plan to eliminate the "Desirable Open Space" designation. An amendment is not necessary and therefore, the recommended action is to retain the designation based on the following justifications:

One, the Plan allows the proposed landfill in the Desirable Open Space designation. It provides guidelines for the order of importance in creating, preserving, conserving, and acquiring of open areas. It states "Areas ... should be maintained as open space in order to provide for public health and safety. This includes lands needed for life support systems such as the water supply, water recharge, water quality protection, wastewater disposal, solid waste disposal, air quality protection, energy production and noise prevention. Natural drainage channels, flood plains, fire hazard areas, airport clear zones and geological hazard areas are also open space necessary to the maintenance of public safety".⁶ The recommended action, to not amend the Open Space Plan, will not impede the proposed landfill that would accommodate City-generated solid wastes and provide additional solid waste disposal capacity in a canyon area that has primarily been disturbed by 30 plus years of prior landfilling activities.

Two, the recommended action includes [Q] conditions that incorporate the FSEIR mitigation measures to protect the environment during and after the active landfill. In addition, conditions of approval include a requirement for the project proponent to contact the City and Santa Monica Mountain Conservancy after closure and post-closure activities for potential consideration for open space.

Lastly, the intent and purpose of the Open Space Plan would be furthered by this action coupled with the County's 1993 approval to operate a landfill immediately abutting the subject site. The recommended action would create a natural buffer of ±100 acres (Open Space

⁵ *Ibid.*, pg. 2

⁶ (*Open Space Plan*, pp. 14-15) (Underline added)

designation, A1-1-K-O zone classification) along the southern perimeter of the subject site. As well as conserve the subject site for potential open space in the future. Second, as part of the County CUP, the applicant has or will dedicated over ± 426 acres in East Canyon and a future dedication of road and trail easement areas in this area, totaling ± 507 acres. In addition, the applicant is working with the County to obtain over ± 480 acres in Bee Canyon for use as open space). These lands have been or will be dedicated as open space, thus allowing future City, County, and State hiking and equestrian trails to be joined.

Relationship to Added Area: The General Plan map amendment will include a statement that the Added Area is intended as a natural buffer area.

Relationship to 100 Acre Buffer: The buffer area will retain its current "Open Space" designation with A1-1-K-O zone classification.

C. **Citywide General Plan Framework Element.**

Background of Framework Element. The *Citywide General Plan Framework Element*, adopted in December 1996 by City Council, is an element of the City's General Plan which provides a citywide, comprehensive, long-range growth strategy and supersedes the older Concept Los Angeles and Citywide Plan elements of the General Plan. "The policies of the *Framework Element*, in all instances, are to seek solutions to public infrastructure and services deficiencies, including their expansion commensurate with the levels of demand experienced." ⁷

Chapter 9 of the *Framework Element*, entitled Infrastructure & Public Services, provides the goals, objectives, and policies for thirteen infrastructure and public service systems to help support the City's population and economy as it moves into the 21st century.

Solid Waste Facilities - "The City of Los Angeles generates and disposes of a significant amount of solid waste both within and outside of its borders. This waste is collected by both City staff, which service residential customers in all single and some multi-family housing, and private waste management companies, which service the remaining

residential and all commercial and industrial firms. In 1990, approximately 12,000 tons of waste per day was produced in the City. In 1989, the California legislature passed the Integrated Waste Management Act (AB 939) which requires all cities to divert 25 percent of their waste by 1995 and 50 percent by the year 2000. Although the actions which help the City achieve the AB 939 targets will significantly reduce landfill disposal, the City will still require landfill capacity to dispose of the remaining waste."⁸

" ... For the solid waste remaining after diversion, the City will have a continuing need for solid waste transfer and disposal facilities. Currently, 26 facilities within the City have Solid Waste Facilities permits. Two are landfill disposal facilities and ten are privately operated transfer stations. The remaining are city facilities such as maintenance yards. As the capacity of the landfills located in Los Angeles is very limited, more transfer facilities will be needed to transfer waste from the collection vehicles and transport it to other, more remote landfill facilities. Capacity must be provided for the waste collected by both City agencies and private collection companies ..."⁹

Conformance with Framework Element. The recommended action conforms with the following goals of the Framework Element in that:

Goal 3A (Distribution of Land): "A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, ... conserves natural resources, and provides adequate infrastructure and public resources, ..." ¹⁰

Goal 3J (Industrial): "Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability."¹¹

⁸ Ibid., pg. 9-3

⁹ Ibid., pg. 9-3 (Underline added)

¹⁰ Ibid., pg. 3.6

¹¹ Ibid., pg. 3-32

With only one solid waste landfill currently operating in the City (i.e., Bradley West), the distribution of land uses contemplated by Goal 3A is not achieved. The proposed landfill would provide adequate infrastructure and a long-term solution to the City's diminishing waste disposal capacity. Development of the proposed project would avoid or minimize many environmental impacts associated with the development of other landfill projects located in natural undisturbed environments. Developing a landfill facility at the subject location, close to the City's wasteshed areas, would reduce impacts associated with transporting wastes to other remote landfills located out-of-County. These associated impacts would be in air quality emissions, the use of energy and natural resources, and the risk of upset conditions. In regards to Goal 3J, the proposed project is anticipated to create 35 additional full-time jobs in addition to 52 jobs created as a result of operating County Landfill and extend employment for a total span of approximately 26 years.

Goal 6A (Open Space):¹² *"An integrated Citywide/regional public and private open space system that serves and is accessible by the City's population and is not threatened by encroachment from other uses."*¹³

Public or private open space uses in the Sunshine Canyon would not be feasible for several decades due to health and safety reasons. The closure and post-closure activities on the City inactive landfill, County operational landfill, and the proposed expansion in the City are incompatible uses for active recreation. The landfill may be available for active recreational uses after closure and post-closure activities.

Open space was required as part of the County Landfill Project approval. Portions of East Canyon (±507 acres) and Bee Canyon (±480 acres) were required to be dedicated and acquired for dedication, respectively. Also, the applicant modified the original request in order to maintain the Open Space designation and A-1 zone classification on the approximately 100 acres above the residential community.

Goal 9F (Solid Waste): *"Adequate collection, transfer,*

¹² Also, see Finding No. 1.B (Open Space Plan).

¹³ *Ibid.*, pg. 6-2

and disposal of mixed solid waste. The City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed of in a manner that minimizes adverse environmental impacts." ... **Goal 9G (Solid Waste)**: "An environmentally sound solid waste management system that protects public health, safety, and natural resources and minimizes adverse environmental impacts." ... **Goal 9H (Solid Waste)**: "A cost-effective solid waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs."¹⁴

The City's solid waste management plans recognize the need for additional solid waste capacity even with the achievement of State mandated diversion goals.¹⁵ Development of the proposed project would allow the safe and sanitary disposal of City-generated wastes in a manner that minimizes potential environmental impacts due to the proposed project's design, operation, environmental mitigation measures, conditions of approval, and natural features such as ridgelines and distance from sensitive uses. In addition, the proposed expansion is primarily within an area disturbed by 30 plus years of landfill operation and is adjacent to the operating County landfill.

The Final SEIR, comprehensively and exhaustively analyzed the potential impacts of the landfill and proposed nearly 200 mitigation measures to minimize such impacts. There are existing infrastructure and ancillary facilities in place to accommodate additional landfill development. The proposed project would provide a feasible, cost-effective solution to the City to meet its waste disposal capacity needs and minimize environmental impacts that would otherwise result from similar development at other natural, undisturbed sites and the environmental and economic impacts of transporting our waste to remote locations.

Relationship to Added Area: None

¹⁴ Ibid., pg. 9-11

¹⁵ According to Denis Keyes, Statistician for the City of Los Angeles Bureau of Sanitation, Citywide Recycling Division, the latest diversion rate for recycling is 46.6 percent in 1997.

D. **City-Collected Refuse Disposal Plan.**

Background of the Refuse Disposal Plan. The 1972, *City-Collected Refuse Disposal Plan* was prepared as a general guide for the City's landfill site acquisition program and refuse disposal operations. The Plan contains several landfill siting criteria: ¹⁶

- accessibility by refuse trucks avoiding travel through residential areas,
- suitability of reclaimed land for subsequent use,
- relationship of the site to the freeway system, and
- availability of suitable screening from adjacent property.

Conformance with the Disposal Plan. The recommended action is in conformance with the siting criteria outlined in the *Disposal Plan* in that:

One, the Final SEIR analyzed the traffic impacts of the proposed use and concluded that the proposed project would not have significant traffic impacts for local residential streets. Due to its location near six freeway systems and with the landfill entrance on San Fernando Road which is a major arterial street, travel through residential streets will be avoided. The residential streets will continue to be used for collector (curb-side) trucks only. Furthermore, Balboa Avenue has a truck weight limit of 6,000 pounds which effectively prohibits refuse trucks larger than curb-side trucks.

Two, following its estimated 26-year operational life span and estimated 30-year mandated post-closure maintenance period, the site could be suitable for a variety of open space or recreational uses.

Three, the site is suitably screened from adjacent properties. To the north and west, surrounding adjacent land uses include undeveloped mountainous terrain. To the west and southwest, vacant property known as Aliso Canyon and East Canyon adjoin the site. The applicant is conserving a buffer of approximate 100-acres of private open space to the south that will be used for existing

environmental control systems, and oil extraction and storage uses. O'Melveny Park lies southwest of the 100-acre buffer. Areas to the east, along San Fernando Road, adjacent to the I-5 Freeway, are the MTA/SCRRA Rail Line as light industrial uses.

The subject site is topographically isolated from surrounding land uses. The ± 100 acre open space area located along the southern perimeter of the site has undergone extensive revegetation, having been planted with over 10,000 trees. This open space area ranges in elevation from 1,425 to 1,975 feet MSL. This elevation is 100 to 600 feet -higher than the elevation of existing residential areas located to the south, which are approximately 1,300 to 1,400 feet MSL. At final fill, the proposed landfill footprint would be located ± 700 feet from the six trailers located east of the landfill entrance, across San Fernando Road. Additionally, the proposed landfill footprint would be located $\pm 1,700$ feet from the closest residential development (Timber Ridge in Granada Hills). The existing perimeter ridgeline, open space area, and portions of the existing inactive landfill are located between these uses, thus forming an effective screening between residential uses and the proposed landfill operations.

In addition, the maximum vertical height of the landfill at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL on a ± 30 acre interior area that is well removed from surrounding ridge lines. Due to its physical location within the interior of Sunshine Canyon, the top deck of the landfill footprint would be effectively shielded from public views from Granada Hills. The higher elevations of the landfill would be visible from the following locations: motorists traveling westbound on the I-210 Freeway, distant views from Sylmar to the southeast, and from upper elevations of the hiking and equestrian trail in O'Melveny Park during final sequencing of the proposed Project. However, as noted in the FSEIR, this would not be a significant impact.

Relationship to Added Area: None

Relationship to 100 Acre Buffer: None

- E. **Highways and Freeways Element.** Dedications and improvements, as outlined in the conditions of approval and as per Bureau of Engineering, will assure compliance with the City's street improvement standards pursuant to

2. **Relation to and Effect upon the General Plan and Plans Being Prepared.** (City Charter, Section 97.2(1)(a):

A. Infrastructure and Public Services Systems Plan.

Background of the City Solid Waste Management Plan. The City's 1972 Refuse Disposal Plan and its policies related to solid waste disposal are in the process of being updated and revised as part of the Solid Waste Management Plan which will be incorporated into an Infrastructure and Systems Element as called for in the General Plan Framework Element.

In June 1988, the City of Los Angeles Board of Public Works adopted the City of Los Angeles Solid Waste Management Action Plan (City Action Plan). In part, it supported the County's Action Plan policies of managing solid waste in the County through public and private operations and facilities, provided 50 years of permitted landfill capacity to be held in public ownership, and encouraged implementation of residential and commercial recycling, composting, and household hazardous waste programs.

In response to the City Action Plan and the termination of the City's attempts to site waste-to-energy facilities as an alternative to landfilling, the City Council authorized the development of a 30-year CiSWMP. This plan identifies ways to manage City waste over the next 30 years. It consists of the following:

City of Los Angeles Solid Waste Management Plan, Phase I Report: Existing Conditions (CiSWMP) (August 1989) This report provided an analysis of existing solid waste conditions. It included an inventory and evaluation of existing solid waste management facilities, analyzed current costs of solid waste management services, and characterized the City's waste stream and its permitting process for solid waste management facilities.

City of Los Angeles Solid Waste Management Plan, Phase II Report: Component Alternatives (CiSWMP) (December 1989) This report evaluated a variety of options for each major component of the solid waste management system. The components analyzed included waste reduction, recycling, waste

collection, waste transportation and transfer, waste processing facilities, and landfilling. Landfill disposal options were based on a review of proposed or potential landfill expansions and new landfill sites that were previously identified.

City of Los Angeles Solid Waste Management Plan, Phase III Report: Description of Solid Waste Management System Alternatives (CiSWMP) (December 1989) This report combined feasible component options from the Phase II report into several comprehensive waste system alternatives. Each combination included waste reduction, recycling, collection, transportation, and disposal components.

City of Los Angeles Solid Waste Management Plan Draft Program Environmental Impact Report (CiSWMP) (July 1990) This report summarized major characteristics that included each component of the solid waste management alternatives considered by the City. Environmental impacts were discussed for each component, and alternatives and mitigation measures were provided for impacts. The CiSWMP Draft Program Environmental Impact Report (DPEIR) summarized major characteristics of waste management alternatives considered for the City. The DPEIR provided an overview of program impacts and mitigation measures and a general context for the waste management program under consideration by the City. The City concluded that, as individual facilities were proposed and sited, the DPEIR would be supplemented by site-specific environmental documents for each potential facility. The DPEIR served as an umbrella document and presented the environmental analysis of those policy choices identified by the City.

City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) (October 1993) The CiSWMPP addressed solid waste collection and disposal services necessary for residents, commercial establishments, and industrial operations over a 30-year period. It provided citywide diversion goals and disposal capacity needed over that period. The CiSWMPP set a goal of 70 percent diversion in the year 2020.

City of Los Angeles Source Reduction and Recycling Element (City SRRE) (October 1994) The City SRRE established an integrated waste management

hierarchy that included source reduction, recycling and composting, and environmentally safe transformation and land disposal of solid wastes. The SRRE described how the City would meet its waste diversion goals of 25 percent by 1995 and 50 percent by the year 2000.

Conformance with the City Solid Waste Management Plan.

The recommended action conforms to the "Local Disposal" Option of the City Solid Waste Management Plans that will form the basis for the future Infrastructure and Public Service Systems Plan, an element of the general plan, in that the number of potential sites is diminishing leaving the City portion of Sunshine Canyon as the current foreseeable viable alternative.

Chapter 6 of the October 1993 *Phase IV Report, Solid Waste Management Policy Plan* sets forth Objective 3.3 regarding Disposal Facilities which states:

"It is the objective of the City of Los Angeles to identify, evaluate, and secure by the year 2000 adequate disposal capacity to accommodate projected waste requiring disposal to the year 2020 with an optional reserve capacity in the year 2020 for 20 years of additional disposal. Waste requiring disposal shall be calculated assuming achievement of Goal 1 [Maximum Waste Diversion]." ¹⁷

To achieve this objective, the Plan presents three policies to secure adequate disposal capacity:

1. A policy of Local Disposal,
2. A policy for Remote Disposal, and
3. A policy for Other Disposal Methods.

The policy of The Remote Disposal calls for the transportation of City waste, either by rail or truck, to remote locations outside the County of Los Angeles, provided such disposal is environmentally safe, technically feasible, and publicly acceptable. The policy describes proposed disposal sites in Riverside, San Bernadino and Imperial counties. With respect to the policy for pursuing Other Disposal Methods, the Plan states that although several have been evaluated, none appear feasible due to implementation, environmental or

¹⁷

October 1993 *Phase IV Report, Solid Waste Management Policy Plan*.

financial issues.

The remaining policy, Local Disposal, states:

Policy 3.3.1 Local Disposal: "It is the policy of the City of Los Angeles that the City shall work closely with the Los Angeles County Department of Public Works, the Los Angeles County Sanitation Districts, other jurisdictions, and private firms to identify and secure additional disposal capacity in and/or outside the county to meet the needs of the City of Los Angeles." ¹⁸

This policy recognizes that even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated in the City. Recognizing that the siting of landfills is extremely difficult and lengthy, the policy provides that the City will look to the expansion of existing landfills, in addition to working with the County to jointly develop landfill capacity.

The list of potential sites that fulfil objectives of the Local Disposal options is diminishing. The report states:

"Expansion of Existing Landfills. Four landfills in the Los Angeles area that accept City-generated waste have the potential for expansion: Lopez Canyon, Bradley West, Chiquita Canyon and Sunshine Canyon The City will continue to monitor the expansion efforts of these landfills quarterly and reevaluate their potential use for disposal of City-generated waste." ¹⁹

However, the four landfills mentioned in this policy as having the potential for expansion are limited as noted in the Los Angeles County's June 1997 *Countywide Siting Element* (CSE) and as noted below:

Lopez Canyon. This City-owned landfill, located in

¹⁸ The October 1993 *Phase IV Report, Solid Waste Management Policy Plan*

¹⁹ *Phase IV Report, Solid Waste Management Policy Plan*, pp. 6-6 and 6-7

Lake View Terrace, had accepted up to 4,000 tpd of solid waste and ceased operation in June 1996.

Bradley West. This landfill, located in the Tujunga area, was granted a variance by the City in July 1996 to increase its daily permitted waste intake from 7,000 to 10,000 tpd. During 1995, this facility had an average disposal intake of 4,604 tpd. The landfill is currently accepting approximately 7,000 tpd of waste and it is projected to reach full capacity in the year 2000.²⁰

Chiquita Canyon. This landfill is located in the northwestern Santa Clarita Valley in an unincorporated portion of Los Angeles County. On February 25, 1997, the landfill's Conditional Use Permit was modified to allow for a landfill expansion to occur on 229 acres and provide a total of 23 million tons of disposal capacity. The operator is limited to a maximum daily disposal intake of 5,000 tons per day, six days per week and the facility has a life expectancy of about twelve years based on this maximum rate.²¹

Sunshine Canyon. Located in the northwest San Fernando Valley, this 1100-acre canyon owned by BFI, includes the City landfill, which ceased operations on September 21, 1991 and the County Landfill, which commenced operations in August 1996 and is permitted to accept up to 6,600 tpd (6,000 average tpd) of waste in addition to inert materials withing the County jurisdiction. Given the amount of waste accepted at the County Landfill since August 1996 and the authorized disposal of nearly 2 million tons per year, the landfill capacity of approximately 17 million tons could be exhausted as early as 2006.²²

2. **Substantial Conformity with Public Necessity, Convenience, General Welfare and Good Zoning Practice.** (City Charter, Section 97.2(1)(b):

²⁰ Los Angeles County's June 1997 *Countywide Siting Element*, pg. 3-18

²¹ *Ibid.*, pg. 7-18

²² County CUP 86-312(5)

Public Necessity

Public necessity for the proposed project is addressed in several comprehensive waste management planning documents developed and adopted by both the City and County²³. These planning documents outline solid waste management policies. Further, they demonstrate the need for the most technically and environmentally feasible expansion of existing solid waste landfills within the Los Angeles region to ensure sufficient solid waste disposal capacity for residential, industrial and commercial sectors. As stated in the City Solid Waste Management Policy Plan (October 1993), even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated in the City.

Recognizing that the siting of landfills is extremely difficult and lengthy, the City Solid Waste Management Plan policies provide that the City will look to the expansion of existing landfills, in addition to working with the County to jointly develop landfill capacity. The document specifically mentions the expansion of Sunshine Canyon.

The California Integrated Waste Management Act of 1989 (i.e., AB 939 *Public Resources Code Section 40000 et seq.*), requires the City to provide at least 15 years of disposal capacity within its own jurisdiction or establish long-term guarantees for such waste disposal outside of its jurisdiction in order to provide for the public safety. The Final SEIR²⁴, indicates that three landfills have recently closed and four of the seven remaining Class III landfills in Los Angeles County are expected to close or reach capacity within the next 10 years. Their closure has and will decrease the City's existing

²³ The plans are: *City of Los Angeles Source Reduction and Recycling Element (City SRRE)*, the *City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP)*, the *City of Los Angeles Solid Waste Management Plan*, the *County and City Solid Waste Management Action Plan(s)*, the *Solid Waste Management and Disposal Options in Los Angeles County*, the *Integrated Solid Waste Management System for Los Angeles County*, the *Los Angeles County Countywide Siting Element (CSE)*, the *County of Los Angeles Source Reduction and Recycling Element*, and the *Los Angeles County Countywide Integrated Management Plan*.

²⁴ Table 2.3-1 (Revised) *Remaining permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in the County of Los Angeles* (See Final SEIR, pp. 2-7 through 2-9). Also, see Appendix A-1 attached to the Commission report.

disposal capacity and place additional demands on existing landfill facilities located in-County and increase the need for future waste to be transported to out-of-County landfills that have disposal capacity.

Convenience

The importance of having a landfill in proximity to City and County generated waste streams is stated in the *Options Report, County Action Plan, CiSWMP, Integrated Solid Waste Management System Draft Program EIR, County SRRE, and CSE*. (Refer to the Draft SEIR, Section 4.7.3, *Solid Waste Management Plans*, pp. 4-273 through 4-281.)

General Welfare

Approval of the recommended action will provide a landfill within the City jurisdictional boundaries, governed by conditions of approval of the grant, and under the City's control. This is in contrast to, by the year 2000, no public or private landfills will be operating within the City (with the possible exception of the Bradley Landfill for 2-3 years); and by 2006, four of the remaining Class III landfills in the Los Angeles region are expected to close or reach capacity. Due to these events, when the City is faced with a shortfall in solid waste disposal capacity and must use landfills outside the City, it may lose local control of managing its solid waste program.

The recommended action would provide adequate infrastructure and a long-term solution to the City's diminishing waste disposal capacity. Furthermore, developing a landfill facility at the subject location, close to the City's watershed areas, would reduce impacts associated with transporting wastes to other remote landfills located out-of-County. These associated impacts would be in air quality emissions, the use of energy and natural resources, and the risk of upset conditions.

Environmental protection and control systems for the Project meet or exceed all Federal, State and local requirements. Construction design and implementation employ the latest materials and design, and operational conditions will be more restrictive than the prior operated City Landfill. For these reasons, and because of the significant physical separation between the proposed project and the nearest residential land uses, the proximity of existing freeway corridors, the topography and geography of the site, and the fact that the site has accommodated landfilling for a 30+ year period.

Good Zoning Practice

Expanding the landfill on a site in the City which has been disturbed for 30+ years is preferred to developing of other potential landfill sites in undisturbed areas presently under consideration.

The infrastructure and conditions needed for a landfill are already in place in Sunshine Canyon to accommodate the expansion. The access road and ancillary facilities that currently support the existing County Landfill will be used. Scale house, scales, administrative offices, caretaker facilities, lunchroom/locker room, general maintenance and control buildings, equipment maintenance and storage buildings, and certain environmental protection and control systems (i.e., leachate treatment plant and storage tanks, surface drainage systems, landfill gas (LFG) collection system and water storage tank) currently being used for landfilling operations in the County would continue to be used and eventually connected or relocated to the City portion of the project site.

ZONE CHANGE AND ADDITIONAL FINDINGS

1. Zone Change (L.A.M.C. Section 12.32). The recommended action is to change the zone classification from A1-1-K-0 to [T][Q]M3-1-0 on approximately 394 acres used for the landfill footprint, ancillary uses including a 500-foot M3 buffer around the inner M3 area.

The M3 zone classification is a corresponding zone to the General Plan designation of "Heavy Industrial". The applicant did not request a permanent T and Q. However, the recommended action is for [T] Permanent and [Q] Permanent classifications. Most applications are granted with temporary Ts and Qs, which pursuant to the Los Angeles Municipal Code allows six years including extensions for requirements add to the new zone to be satisfied or guaranteed. A permanent zone classification, pursuant to Section 12.32.K of the Code, eliminates this time limit. An exception, as here, is made because of the complexity of the development and phasing of the project may require a longer period.

The recommended zone change is not adversely affected by any applicable specific plans or plans being prepared. The recommended action is in conformance with public necessity, convenience, general welfare and good zoning practice, as noted in Finding No. 3, in that the zone change will allow optimal use of the site.

Relationship to Added Area: The project proponent requested a zone change from A1-1-K-0 to M3-1 on the Added Area. The recommendation is to not consider this request because it was not applied for by the owner or initiated by the City. To ensure proper planning, it would be more effective to rezone the area when a project is known to be even possible. At that time, the decision-makers can evaluate environmental and land use issues.

The recommended action does not create an industrial/residential conflict because it is not reasonably foreseeable that the Added Area will be developed. According to Chicago Title, the property appears never to have been insured by a title company. It is landlocked and has remained vacant and unused since 1927. It was purchased with full knowledge of its lack of access. In fact, the Director's Deed (83-431375) states, "There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway. The above-described real

property is landlocked and without any direct access to the freeway or any public or private road. The State of California is without obligation or liability to provide access to the said real property."

Relationship to the 100 Acre Buffer: None

2. Any City required installation or upgrading of street lights, if necessary to complete the City street improvement system, is to increase night safety along the streets that adjoin the subject property.
3. The subject project, which is in Los Angeles County, will have an impact on fish and wildlife resources or habitats upon which fish and wildlife depend, as defined by California Fish and Game Code Section 711.2. The recommended project is not exempt from the Fish and Game Fee
4. Modifications to the Environmental Mitigation Measures. Modifications of the proposed mitigation measures are necessary for the following reasons:
 - a. Mitigation measures relating to fugitive dust are supplemented by Condition No. C.3 (Fugitive Dust) to provide additional mitigation of the air quality impacts and model conditions applied to the County Landfill.
 - b. Mitigation measures relating to grading are supplemented by Condition No. C.4 (Grading) to clarify the process for approval of grading areas outside of and above the cut and fill shown on Exhibit No. E-4B and to model conditions applied to the County Landfill.
 - c. Mitigation measures relating to litter are supplemented by Condition No. C.6 (Litter) to provide additional mitigation of air quality and nuisance impacts and model conditions applied to the County Landfill.
 - d. Mitigation measures relating to revegetation are supplemented by Condition No. C.8 (Revegetation) to provide additional mitigation of earth resources, surface and groundwater, biological resources, and model conditions applied to the County Landfill.
 - e. Mitigation measures relating to Transportation and Circulation are supplemented by [T] Conditions (Transportation and Circulation) to modify and clarify the process for when the improvements shall be made.

- f. Mitigation measures relating to wetlands and riparian habitat are supplemented by Condition No. C.9 (Riparian habitat) to provide additional mitigation of wetlands and riparian habitat through a 2:1 off-site replacement program giving preference to placing the off-site mitigation in the immediate vicinity of the landfill or an urbanized area whereby providing outdoor experience and education within proximity of a larger population.
 - g. Mitigation measures relating to oak trees are supplemented by Condition No. C.7 (Oak Trees) to provide additional mitigation to control the rate of oak tree removal and model conditions applied to the County Landfill.
5. The proposed project has been further restricted by the conditions of approval. Such limitations are necessary to protect the best interests of, and to assure a development more compatible with the surrounding property. The conditions are tailored to the specific issues of the site and drafted to ensure that development proceeds in an attractive, orderly and harmonious fashion and in conformance with the general plan. The reasons of the additional conditions are as follows:

[T] Conditions relating to infrastructure and municipal services are recommended to ensure that the proposed project is properly developed and coordinated with traffic/circulation, sewers, police, fire, and other City services.

[Q] Conditions Nos. A.7 and C.1, relating to the Mitigation and Monitoring Program, are recommended to ensure that the recommended mitigation measures in the Final SEIR are requirements of the proposed project.

[Q] Conditions Nos. A.6, B.2.d.2).e), relating to Annual Reports and Phasing enable continuous monitoring of the conditions of approval in order to protect the environment and the public health, safety, or welfare of citizen's of the City.

[Q] Conditions Nos. A.4 and D, relating to enforcement are to place the permittee on notice of the City's authority to compel compliance with the conditions in order to protect the environment and public health, safety, or welfare.

[Q] Condition Ns. A.8, relating to bonding ensures that the City will be able to initiate mitigation measures, if the permittee does not respond in a reasonable manner to

compliance requests.

[Q] Conditions on "Design and Development" relating to signs and graffiti removal are to promote an industrial development that is attractive, safe for patrons ,and to discourage factors that may degrade the visual environment.

[Q] Conditions for a Community Protection Program are to guarantee that interested parties are informed of the permittee's development, maintenance, and compliance with conditions of this approval which will ensure concerns are addressed early, before they grow into controversy.

CEQA FINDINGS

1.0 INTRODUCTION

1.1 CEQA Findings

The Guidelines for the Implementation of the California Environmental Quality Act (State CEQA Guidelines), codified in the California Code of Regulations (CCR), promulgated pursuant to CEQA (as amended), and the City of Los Angeles CEQA Guidelines (City CEQA Guidelines) provide that "[n]o public agency shall approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant environmental effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more written findings for each of those significant effects" (State CEQA Guidelines, § 15091). As identified in the State CEQA Guidelines, possible findings include the following:

1. changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;
2. changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; and
3. specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the final environmental impact report.

With respect to those significant effects that are subject to the latter finding, the public agency shall further identify specific overriding economic, legal, social, technological or other benefits of the pending project before the agency decision-makers that outweigh the significant effects of that project on the environment. Pursuant to CEQA and the State CEQA Guidelines, required findings shall be supported by substantial evidence in the administrative record.

These CEQA Findings, which relate to the Final Subsequent Environmental Impact Report (Final SEIR) for the Sunshine Canyon Landfill, State Clearinghouse Number 92041053, set forth the environmental basis for current discretionary actions by the City of Los Angeles (City) and future discretionary actions that may be

undertaken by the County of Los Angeles (County) and other Responsible Agencies for the implementation of the proposed Sunshine Canyon Landfill Project (herein the "City/County Landfill" or the "project").

References to specific statutes, ordinances and regulations shall include any successor statutes, ordinances and regulations. Please refer to the List of Acronyms and Abbreviations and Glossary of Terminology for the definition of such terms used in these guidelines.

1.2 Document Format

This document is comprised of the following sections:

Section 1 presents an introduction to the CEQA Findings.

Section 2 provides a summary of the proposed project, a statement of project objectives, and an overview of discretionary actions required for the project.

Section 3 presents a summary of those activities and events that have preceded the consideration of the CEQA Findings by the City as part of the environmental review and public participation process.

Section 4 sets forth findings regarding those environmental impacts that were initially identified in the City's Initial Study (Initial Study); the Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill, State Clearinghouse Number 92041053 (Draft SEIR); and the Final Subsequent Environmental Impact Report, Sunshine Canyon Landfill, State Clearinghouse Number 92041053 (Final SEIR), which were determined by the City not to be relevant to the proposed project or were determined to clearly not manifest at levels that were deemed to be significant.

Section 5 sets forth the significant or potentially significant effects of the proposed project that can feasibly be mitigated to a less than significant level through the imposition of specified mitigation measures included in the project's Mitigation Reporting and Monitoring Program (MRMP).

Section 6 sets forth findings regarding the significant or potentially significant environmental impacts that may or will result from the construction and/or operation of the proposed project and which the City has determined cannot feasibly be mitigated to a less than significant level.

Section 7 provides findings regarding those alternatives to the project that were examined in the Draft SEIR, considered by the City Planning Commission and City Council as part of their deliberations on the proposed project and its environmental documentation, and which were not recommended for selection by the City Council for implementation.

Section 8 contains the findings regarding the MRMP for the proposed project, and findings regarding other CEQA considerations, including Irreversible Environmental Changes and Growth Inducing Impacts of the project.

Section 9 consists of the Statement of Overriding Considerations that sets forth the City's reasons for finding that specific economic, legal, social, technological and other considerations associated with the proposed project outweigh the project's potential unavoidable significant environmental effects.

The findings set forth in each section herein are supported by and based on evidence contained in the administrative record of the proposed project.

1.3 Custodian and Location of Records

The environmental documents and other materials that constitute the administrative record for the City's actions upon the proposed project are maintained and located at the following address:

City of Los Angeles

Department of City Planning
Environmental Review Section
221 N. Figueroa Street, 15th Floor
Los Angeles, CA 90012-2601

This department is the official custodian of the administrative record for the proposed project.

2.0 PROJECT SUMMARY

The following information provides an overview of the project's location and operations, the discretionary actions required for project implementation, and a statement of specific project objectives.

2.1 Regional Location/Project Setting and Access

The project site is located within the northwest Los Angeles region and within the corporate jurisdiction of the City of Los Angeles and County of Los Angeles ([County] Fractional Sections 23 and 24, Township 3 North, Range 16 West, San Bernardino Base Meridian in the County). The project site is further defined within the Northwest Valley Subregional planning area of the City. The project site is included within the City's Granada Hills-Knollwood Community Plan Area (CPA) and the County's Santa Clarita Valley Areawide General Plan.

2.1.1 Project Site Location and Setting

The project site address is 14747 San Fernando Road, Sylmar, California. Generally, the project site is surrounded by unincorporated areas of the County to the north and west and the communities of Granada Hills and Sylmar to the south and east, respectively. The project site is approximately $\frac{3}{4}$ mile southwest of the intersection of the Golden State Freeway (I-5) and Antelope Valley Freeway (SR-14) multilevel interchange. More specifically, the entrance to the project site is situated $\frac{3}{4}$ mile northwest of the intersection of Balboa Boulevard and San Fernando Road in the City.

2.1.2 Project Site Area

The general site area in Sunshine Canyon includes ± 494 acres in the City and ± 608 acres in the County. Of this total of $\pm 1,102$ acres, approximately 451 acres would be used as the footprint of the City/County Landfill (see below).

2.2 Overview of The Proposed Project

The City is evaluating a proposal that consists of the development, operation, maintenance and monitoring of a Class III nonhazardous solid waste landfill (herein the "City/County Landfill" or the "project"). A ± 194 acres portion of the City/County Landfill footprint is located within the City portion of Sunshine Canyon and provides an estimated net airspace disposal capacity of 55 million tons within the City. In order to facilitate the design of the City/County Landfill, an area of approximately 42 acres within the County portion of Sunshine Canyon would also be jointly developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the proposed landfill in the City and the existing operational County Landfill (landfill footprint of ± 215 acres).

As originally proposed, the City and County landfill areas would have been operated separately, thereby providing an average capacity of 5,000 tons per day (tpd) in the City in addition to the currently authorized 6,000 tpd in the County; and, within 18 to 24 months following the commencement of landfilling operations in the City, the City and County landfilling operations would have been combined into a single landfill operation with one working face, which would allow an average waste intake rate of 11,000 tpd, with a daily maximum of 12,100 tons.

The approved alternative, however, is to combine landfilling operations into a single working face immediately upon the authorization of landfilling in the City and County portions of the Canyon. This combined development of land within both jurisdictions would result in one landfill footprint being constructed in Sunshine Canyon. The landfill footprint would eventually encompass a total of ± 451 acres and would result in a net waste disposal capacity of 90 million tons of potential disposal capacity, comprised of 55 million tons in the proposed landfill within the City and 35 million tons within the County. Of the total County capacity, 17 million tons would be in the permitted and operational County Landfill and 18 million tons would be within the additional ± 42 acres and its airspace developed within the County. This combined City/County development would provide approximately 26 years of disposal capacity, assuming an average disposal rate of 11,000 tpd and 66,000 tons per week. This proposed landfill footprint would abut and encompass ± 80 acres of the existing inactive landfill located in the City.²⁵

It is anticipated that concurrent with project approval, which will require separate project entitlements from the City and County, these jurisdictions will enter into some form of agreement to exercise authority over the entire project site. Such an agreement would authorize the joint development and operation of a single landfill within both jurisdictions of Sunshine Canyon.

The proposal also consists of developing and operating numerous ancillary areas and facilities to support landfilling operations at the City/County Landfill, such as the environmental learning center. Except for the movable recycling facilities, all of these proposed uses would be external to the proposed landfill footprint and located within the City portion of Sunshine Canyon.

²⁵ This inactive landfill ceased operation on September 21, 1991, due to the expiration of its zoning variance (ZA 17804). This existing landfill is comprised of two separate waste management units consisting of a total of ± 205 acres and containing approximately 25 million tons of solid waste.

The proposed City/County Landfill would also entail the relocation of certain of the ancillary facilities that currently support the existing County Landfill. These include the scale house, scales, administrative offices, caretaker facility, lunchroom/locker storage, maintenance and control buildings, and certain environmental protection and control systems (i.e., leachate treatment plant and storage tanks, surface drainage systems, and water storage tank).

Although the original proposal envisioned that the relocation of these facilities, except the scale house, scales, maintenance and control buildings, and leachate treatment plant and storage tanks, would occur approximately 18 to 24 months following the commencement of landfilling operations within the City, at the time landfilling operations would be combined at a single working face area, the preferred alternative of immediately commencing the combined operations upon obtaining governmental entitlements would require such relocation when the City and County areas have been prepared for the receipt of waste. The relocation of all other facilities (i.e., scale house, scales, maintenance and control buildings) and environmental control systems (i.e., leachate collection and treatment facility and storage tanks, and water tanks) located within the County would occur within a 2- to 3½-year period.

2.3 Primary Purpose and Objectives of the Proposed Project

The primary purpose of the City/County Landfill is to provide additional solid waste disposal capacity to meet the anticipated short-, mid- and long-term disposal needs within the Los Angeles region. The development of the City/County Landfill would include both project-specific development and solid waste planning objectives. These objectives exist within the broader context of State-mandated policies and adopted County and City integrated solid waste management policies and goals developed by these agencies for an effective and coordinated approach to short-, mid- and long-range integrated waste management planning.

2.3.1 Development Objectives

The project proponent has identified a number of objectives for the proposed project. These objectives include, but may not be limited to, the following:

- ▶ develop a solid waste landfill on project proponent-owned land within the City and County jurisdictions that is primarily disturbed due to extensive landfilling operations that have taken place during a 30-year period;

- ▶ develop a landfill footprint within the City to connect with land in the County (±42 acres) and the operational County Landfill, thus providing combined landfilling operations at a single landfill footprint in Sunshine Canyon;
- ▶ perform landfilling operations within a single landfilling area in either jurisdiction using a cut-and-cover fill method for landfilling;
- ▶ ensure the proponent's commitment to meeting environmental, health and safety goals, as well as to exceed regulatory standards and requirements during landfilling construction, operation and closure;
- ▶ reduce the project proponent's long-term capital outlay for site infrastructure by utilizing existing onsite infrastructure improvements, including utilities, an improved site entrance for ingress/egress of traffic, an onsite access road, improved scale facilities and check-in area (for weighing and accounting for the wastes to be deposited), surface drainage improvements, and other environmental protection and control systems;
- ▶ effectively utilize the project proponent's existing transfer stations/material recovery facilities (MRFs), solid waste collection company services, and other related facilities in the Los Angeles region to support the operation of the proposed City/County Landfill Project;
- ▶ generate 35 new full-time jobs within Los Angeles County at the project site and provide numerous short-term construction jobs during each sequence of landfill development; and
- ▶ provide cost-effective, short-, mid-, and long-term solid waste disposal capacity at the project site for residences and businesses within the Los Angeles region.

2.3.2 Solid Waste Objectives

The development of the proposed project exists within the context of solid waste objectives adopted by the City and County. Furthermore, these objectives include, but may not be limited to, the following:

- ▶ provide efficient solid waste management and disposal capacity to the City and County by developing a landfill facility to avert an identified short-term and potential future long-term solid waste disposal capacity shortfall;
- ▶ provide both City and County jurisdictions the opportunity for long-term solid waste disposal capacity;
- ▶ recover, recycle and/or reuse to the extent practicable certain of the waste materials that would otherwise be disposed of at the City/County Landfill by providing a form of green waste/wood waste and other materials recycling;

- ▶ minimize impacts on air quality within the South Coast Air Basin (SCAB) by providing additional disposal capacity within the Los Angeles region, thereby reducing emissions from transporting refuse longer distances;
- ▶ provide cost-effective disposal options for the City, County and private haulers at a landfill facility within the region to minimize transportation costs;
- ▶ minimize significant impacts on environmental resources associated with the development of new landfill sites (i.e., proposed sites located within undisturbed canyon areas or remote desert locations) by using areas of the existing inactive landfill and other areas within Sunshine Canyon that are primarily disturbed and that have infrastructure in place to readily accommodate future development; and
- ▶ facilitate local and regional efforts directed toward attaining solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the City of Los Angeles Source Reduction and Recycling Element (City SRRE), the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, the Los Angeles County Countywide Siting Element (CSE), the County of Los Angeles Source Reduction and Recycling Element (County SRRE), and formally executed agreements between the County and the City that identify the need for the maximum technically and environmentally feasible expansion of landfill sites.

2.4 Discretionary Actions

The development of the proposed City/County Landfill would be subject to numerous discretionary actions, permits and approvals from federal, State, regional and local agencies. The City, as the Lead Agency, has the discretionary authority over initial project approvals and entitlements (e.g., GPA/ZC, Oak Tree Permit, etc.) within its jurisdiction. Upon certification of the Final SEIR by the Lead Agency, Responsible Agencies such as the County would use this document in their decision-making and permitting process. Table 2.4-1 presents a summary of all known permits and discretionary actions that would be required for the proposed project.

In addition, various ministerial permits required for the proposed project would be issued by various City and County departments and agencies. These permits would be necessary to facilitate infrastructure and building improvements (e.g., fire, electrical, plumbing, sewer, drainage, flood control, etc.).

Table 2.4-1
SUMMARY OF REGULATORY PERMITS /DISCRETIONARY ACTIONS

Agency	Permit or Review
Federal	
U.S. Department of the Army Corps of Engineers (Corps)	Nationwide Permit No. 26
State	
California Integrated Waste Management Board (CIWMB)	Solid Waste Facilities Permit
California Department of Fish and Game (CDFG)	Streambed Alteration Permit
State Water Resources Control Board (SWRCB)	Water Quality Certification
Regional	
Los Angeles Regional Water Quality Control Board (LARWQCB)	Waste Discharge Requirements Compliance with Federal Municipal Solid Waste Landfill Wetlands Siting Regulation
South Coast Air Quality Management District (SCAQMD)	Authority to Construct and Permit to Operate
County	
Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (SWMC/IWMTF)	Finding of Conformance
County of Los Angeles Regional Planning Commission and Board of Supervisors	Conditional Use Permit Working Arrangement with City
City	
City of Los Angeles Planning Commission and City Council	Certification of Final SEIR Mitigation Monitoring and Reporting Program General Plan Amendment Zone Change Working Arrangement with County
City of Los Angeles, Department of Public Works, Bureau of Sanitation, Industrial Waste Division	Industrial Waste Permit

Table 2.4-1
SUMMARY OF REGULATORY PERMITS /DISCRETIONARY ACTIONS

City of Los Angeles, Department of Environmental Affairs, Local Enforcement Agency (LEA)	Solid Waste Facilities Permit
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3.0 ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION PROCESS

Numerous actions have been undertaken by the City to facilitate public participation during the environmental review of this project, including the following:

- An Initial Study (dated July 25, 1991) and/or the Notice of Preparation (NOP) was disseminated to agencies, organizations, and those requesting notification in accordance with 15082 of the State CEQA Guidelines. A 30-day predraft circulation period was initiated by the City Planning Department on April 11 through May 11, 1992. Responsible Agencies, interested parties, and organizations were encouraged to submit comments on the proposed project.
- The NOP for the proposed project was sent to over 10,000 property owners and occupants located within a two-mile radius of the project site boundaries to also solicit comments on the proposed project. Approximately 170 interested parties (e.g., City departments, the County, adjacent cities/counties, and Responsible Agencies) received a copy of the NOP/Initial Study by certified mail.
- On April 29, 1992, a public scoping meeting was held at John F. Kennedy High School in Granada Hills, California, to describe the proposed project, define the environmental review process, and solicit input from the general public concerning relevant environmental issues. Notification regarding the public scoping meeting was sent to numerous federal, State, regional, and local agencies. In addition, the City notified residents within a two-mile radius of the project site.
- Subsequent to the scoping meeting, the City independently reviewed the preliminary findings contained in the Initial Study prepared for the proposed project and, based on these findings, determined that implementation of the project had the potential to result in significant environmental impacts.
- On July 11, 1997, the City completed its independent review of the Draft SEIR, State Clearinghouse Number 92041053. The two-volume Draft SEIR is comprised of Volume I - Draft Subsequent Environmental Impact Report and Volume II - Technical Appendices. These documents provide information concerning the City's preliminary findings about the direct, indirect, and cumulative environmental impacts resulting from construction and operation of the proposed project. The Draft SEIR was prepared in accordance with CEQA and the State CEQA Guidelines and has reflected the independent judgment of City

staff concerning the proposed project and its environmental implications resulting from project implementation.

- On July 24, 1997, pursuant to the noticing obligations delineated in State CEQA Guidelines, the City prepared a Notice of Completion (NOC) and Notice of Availability (NOA) for the Draft SEIR. The NOC and Draft SEIR were then forwarded to the Governor's Office of Planning and Research in that agency's role as State Clearinghouse. Receipt of the NOP by the State Clearinghouse (on July 24, 1997) commenced the beginning of a 90-day public review period. That period officially concluded on October 31, 1997; however, comments received after this date were incorporated into the Final SEIR. In accordance with CEQA and the State CEQA Guidelines, the City also transmitted copies of the NOC and Draft SEIR to Responsible Agencies, organizations, and interested individuals located within the San Fernando Valley area, and libraries within the Los Angeles region. In addition, based on the City's noticing requirements, an NOA was published on July 24, 1997, in the Los Angeles Times (a newspaper of general circulation). The NOA was also published in both the Signal and Daily News on July 24, 26, and 27 and on August 2 and 3, 1997.

Written comments were received by the City during the public review period. These comments were assembled by the City and under the direction of the City were responded to by the environmental consultant within the Final SEIR. Written responses to those comments that raised issues regarding the environmental effects of the proposed project were incorporated into the Final SEIR, pursuant to Section 15132 of the State CEQA Guidelines.

4.0 ENVIRONMENTAL EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION MEASURES

4.1 Determinations Made Regarding Environmental Issues

Based on the information developed in the preparation of the Final SEIR and the record in this matter, the City finds that the following potential environmental effects of the project are insignificant without the imposition of mitigation measures:

Air Quality (Health Risk Analysis) - Section 4.2.9 of the Draft SEIR

A health risk assessment (HRA) was conducted to evaluate the carcinogenic and noncarcinogenic risks associated with toxic air contaminant (TAC) emissions from the Sunshine Canyon Landfill. The risks due to the

cumulative emissions from both the "City" and "County" portions of the project were calculated.

The approaches and methodologies used in this risk assessment were from the document entitled, "Air Toxics Hot Spots Program, Revised 1992 - Risk Assessment Guidelines", prepared by the AB 2588 Risk Assessment Committee of the California Air Pollution Control Officers Association (CAPCOA), October 1993. Input assumptions were coordinated with the staff of the South Coast Air Quality Management District (SCAQMD). The CAPCOA procedures for risk assessments from airborne contaminants is the methodology recommended for use by the SCAQMD. All emission estimates used to calculate risk values were from monthly analyses of landfill gas and from periodic emission source tests of the existing flare conducted pursuant to SCAQMD requirements.

Per the requirements of the SCAQMD, the HRA addressed a total of 18 substances on the SCAQMD Rules 1150.1 and/or 1401 lists for the landfill risk evaluation. Of the 18 substances, 10 are considered carcinogenic and were evaluated as part of the cancer risk evaluation. The noncancer health effects evaluation addressed 17 of the 18 substances for chronic impacts, and 7 of the 18 substances for acute impacts

The lifetime carcinogenic risk was estimated for an individual assumed to reside continuously for 70 years at the off-site location of maximum ground-level concentration for the maximum exposed individual (MEI). The chronic and acute health risks were calculated in terms of a "hazard index". This index is calculated by dividing the predicted maximum short- (acute) and long-term (chronic) pollutant exposures by an established safe exposure level called the Reference Exposure Level (REL).

Individual Cancer Risk. Excess cancer risk was calculated by assuming the MEI remains outdoors for 24 hours per day for 365 days per year, for 70 years. While a 70 year exposure assumption is the standard assumption for a CAPCOA health risk assessment, the excessively conservative (over-predictive) nature of this assumption needs to be recognized.

The worst-case MEI exposure was calculated at 0.96 in one million (the predicted chronic exposure for 70 years of LFG emissions). A risk of one in a million is considered less than significant. Risks up to ten in a million are considered acceptable if toxics best available control

technology (T-BACT) is used to reduce emissions. Flares are considered T-BACT for landfills. The excess cancer risk is thus below the "de minimus" insignificance threshold, and far below the allowable exposure for a T-BACT equipped source.

Chronic Health Risk. The TACs considered in this assessment are known to potentially affect seven organs/systems in the human body. Non-cancer effects are calculated through a ratio of the TAC exposure to a published level determined to have no observable health effect (the REL). The sum of all the individual ratios for every identified pollutant emitted by a source is called the health hazard index (HHI). An HHI of 0.5 is considered a potentially significant impact that would require additional analysis. If the HHI is less than 0.5 (below 50 percent of the "safe" exposure level), no additional analysis is necessary. The Final SEIR demonstrated that the HHI for any individual target receptor location in the human body was well below the significance level of 0.5. Although HHI's are not strictly additive, the combined threat to all organs/systems was estimated at 0.011, which is well below the 0.5 HHI significance threshold. Accordingly, chronic non-cancer health effects from landfill proximity are less than significant.

Acute Health Hazard. The acute health hazard was similarly calculated as the chronic HHI. The acute HHI from the seven compounds with an acute health threat was calculated to be 0.16, which is below the 0.5 HHI significance threshold for acute non-cancer health impacts. Therefore, acute health impacts are considered less than significant.

Noise (Construction Noise Impacts) - Section 4.5.1 of the Draft SEIR

Although construction noise levels, primarily from heavy equipment, would result in a short-term increase to existing ambient noise levels near the closest receptor (located 1,700 feet southwest of the nearest point of the construction area onsite) from 52.4 dBA to 54 dBA this would not be considered a significant increase since construction noise levels would not exceed 75 dBA within 500 feet of a residential zone (as stated in the City Noise Ordinance No. 161, 574).

Noise levels would also increase primarily as a result of traffic generated by construction worker commute trips

(approximately 70 trips during the a.m. and p.m. peak hours). The main point of potential impact would be at the landfill entrance because all construction workers would use this access roadway and certain receptors are located directly across the street, along San Fernando Road. It is anticipated that 70 trips would be added to the existing 1,970 vehicles that already use San Fernando Road during the a.m. peak hour. An additional 70 vehicles would add less than 0.2 dBA to the peak hour traffic noise (and far less to the CNEL). This impact would not be considered audible or present a significant noise impact on sensitive receptors in the immediate area. The total project contribution to the p.m. peak hour traffic noise level would be considered even less since the existing p.m. peak hour traffic volumes are greater than a.m. peak hour volumes. Therefore, traffic-generated ambient noise impacts would not be considered significant since the proposed project would not (1) raise the ambient noise CNEL by 3 dBA (barely perceptible) if the existing noise level exceeds 65 dBA CNEL at a receptor location or (2) raise the ambient CNEL by more than 5 dBA (a clearly perceptible change) and remain under 65 dBA CNEL at a receptor location.

Land Use (City General Plan Elements) - Section 4.7.2 of the Draft SEIR

The following City General Plan Elements were analyzed for consistency with the proposed project and determined not to be significantly impacted:

Citywide General Plan Framework Element. The proposed project would be consistent with Goals 3A, 3J, 6A, 9F, 9G, and 9H and therefore would not result in significant impacts nor require additional mitigation measures.

City-Collected Refuse Disposal Plan. Development of the proposed project would conform to this Plan's criteria regarding access, haul routes, postclosure use, and availability of suitable screening from adjacent property and therefore would result in a less than significant level of impact.

Open Space Plan. The proposed project would comply with goals and policies of the Open Space Plan, as described below, and therefore would not result in a significant impact on this plan nor require additional mitigation measures. The proposed project would enhance the ±100 acre open space area along the southern perimeter of the project site and maintain the current Open Space land use

designation of this area. Although the proposed City/County Landfill project would not add hiking/equestrian trail areas to City's existing hiking and trail system, the project proponent did dedicate over ±426 acres in East Canyon and will arrange for additional dedication of road and trail easement areas in this area in the future. The total dedication in East Canyon will encompass ±507 acres. In addition, the project proponent is in the process of obtaining over ±480 acres in Bee Canyon for open space dedication as part of County Landfill approval. These lands have been and will be dedicated as open space, thus allowing future City, County, and State hiking and equestrian trails to be joined.

The remaining ±394 acres of the project site (in the City) proposed for a general plan amendment and zone change from Open Space to Industrial and from A1-1-K-O to M3-1-O, respectively, to permit the development, operation, and monitoring of a Class III nonhazardous landfill in Sunshine Canyon, has been found to conform to provisions and policies of the Open Space Plan relating to the preservation of open space in order to provide for the public health and safety, including lands needed for solid waste disposal. The plan recognizes the importance of maintaining open space, such as lands necessary for "water quality protection, wastewater disposal, solid waste disposal, air quality protection, energy production, and noise prevention," by assigning to such lands the first priority for creation, preservation, conservation, and acquisition.²⁶ Implementation of the proposed project would accommodate City-generated wastes and provide for the development of additional disposal capacity in a canyon area that has been disturbed due to 30 years of prior landfilling activities.

Land Use (Solid Waste Management Plans) - Section 4.7.3 of the Draft SEIR

The following City and County solid waste management plans were analyzed in the Draft SEIR: *Solid Waste Management Status and Disposal Options in Los Angeles County, Los Angeles County Solid Waste Management Action Plan, City of Los Angeles Solid Waste Management Action Plan, City of Los Angeles Solid Waste Management Plan, City of Los Angeles Solid Waste Management Policy Plan, City of Los Angeles Source Reduction and Recycling*

²⁶ *Ibid.*, p. 14.

Element, Integrated Solid Waste Management System for Los Angeles County, Los Angeles County Source Reduction and Recycling Element, Los Angeles County Countywide Integrated Waste Management Plan, and Los Angeles County Countywide Siting Element. These plans either identified the need to provide additional solid waste disposal capacity within Los Angeles County or specifically identified the expansion of Sunshine Canyon Landfill as a way to meet this need, therefore the proposed project would be consistent with these plans.

Natural Resources - Section 4.8 of the Draft SEIR

Proposed landfill operations would not involve the development of new oil or gas wells or the reuse of existing wells. The operation of the proposed project would not result in the depletion of these natural resources or active wells. Similarly, no gravel or soil extraction activities are proposed and, with the exception of excavation for the placement of refuse and obtaining cover material, no excavation of subsurface materials is proposed. Therefore, the project will not result in any significant impact on natural resources.

Risk of Upset (Transmission Lines) - Section 4.9.8 of the Draft SEIR

Based on information provided by SCE, exposure levels to electrical and magnetic fields (EMF) greater than those encountered at home would only occur when individuals are positioned within approximately 35 feet from the edge of the two existing 66 kilovolt (kV) electrical transmission lines that traverse the site. At that distance, depending on the elevation of the transmission lines, magnetic levels of 5 mG or greater can be anticipated. Based on typical landfill operations, workers and heavy equipment operators would not be expected to spend any significant amount of their time proximate to these lines or within their easements. A hauler depositing waste would only be within this area for a short period (approximately 5 to 7 minutes) to dispose of a waste load. Therefore, no substantial evidence exists to indicate that a significant health risk attributable to EMF would impact landfill workers or other affected parties when project-specific activities place those individuals in proximity to either the Newhall or West Saugus transmission lines.

Population - Section 4.10 of the Draft SEIR

Environmental impacts were determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Additionally, the proposed City/County Landfill Project will not result in the relocation of any persons from the project site. No permanent residential units are planned for development as part of the proposed project. The implementation of the proposed project will not induce indirect demands for additional residential housing units in the local project vicinity or within the region. Construction and preconstruction activities are limited to the duration of project development. Job opportunities associated with operation of the proposed project are anticipated to be provided by the existing labor force in the immediate area and/or region. As a result, the City has determined that no additional analysis is warranted in the Draft SEIR.

Housing - Section 4.11 of the Draft SEIR

Environmental impacts were determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Additionally, the implementation of the proposed project is not expected to create an additional demand for residential housing or affect existing housing stock in either the project vicinity or region. Furthermore, implementation of the proposed project is not expected to significantly impact the availability of rental housing in the Granada Hills-Knollwood Community Planning Area (CPA) or County Santa Clarita Valley area. Implementation of the proposed project would create direct and indirect short- and long-term employment opportunities. The extent of the proposed project employment opportunities is not significant and can be accommodated by the region's existing labor force. As a result, the proposed project is anticipated to have only a minimal effect on existing housing markets in the Los Angeles region; therefore, no additional analysis of this topical issue is provided in the Draft SEIR.

Implementation of the proposed City/County Landfill Project is not anticipated to impact the property value of existing residential units proximate to the project site. A residential valuation study was prepared by Dr. Chapman Finley of JurEcon, Inc., for the Sunshine Canyon Landfill County Expansion entitled *An Evaluation of the Sunshine Canyon Landfill's Impact on the Value of Homes in Adjacent Residential Neighborhoods* (November 1988) and provided in the *Draft Environmental Impact Report, Sunshine Canyon Landfill Extension, Responses to Comments*, Volume A, Appendix 7. Based on this study,

which compared neighborhoods adjacent to the project site with four similar residential areas located at specified distances from the site, it was determined that the existing inactive landfill (when operational) had no discernible economic impact on property values in the immediate area. A similar study was conducted for the Puente Hills Landfill during its environmental review. Findings of that study concluded that property values near that landfill were not impacted as a result of landfill development or operation. Results of both of these studies are summarized in the Draft SEIR, Volume II, Appendix C14. It is expected that development of the proposed City/County Landfill Project would have no significant impact on the resale value of residential homes in the project vicinity; therefore, no further analysis is included in the Draft SEIR.

Transportation and Circulation (Los Angeles County Congestion Management Program) - Section 4.13.2 of the Draft SEIR

Since a.m./p.m. peak-hour project-generated trips are below the threshold of 150 or more trips, as stated in the Congestion Management Program Traffic Impact Analysis warrants and procedures, no analysis was performed and no mitigation is required. The peak-hour project-related traffic assignments indicate that the proposed City/County Landfill Project will add a maximum of 73 trips in either direction along the I-5 Freeway during the a.m./p.m. peak hours.

Transportation and Circulation (Construction-Related Traffic) - Section 4.13.3 of the Draft SEIR

Construction-related traffic impacts on adjacent roadway networks will be minimal, short term, and of limited duration and therefore would not significantly impact transportation and circulation. During construction activities, it is anticipated that onsite personnel would not exceed 70 persons. Based on one person per vehicle, approximately 140 trip ends would be generated daily (i.e., 70 inbound and 70 outbound). In addition construction-related vehicles would generate up to 16 trips (eight inbound trips and eight outbound trips).

Transportation and Circulation (Access Roadway in Sunshine Canyon) - Section 4.13.5 of the Draft SEIR

As part of implementation of the proposed City/County Landfill Project, the existing access roadway will be

used until realignment of the roadway is required to accommodate the development of landfilling areas within the project site. During this development, the access road would be progressively shortened and realigned toward the mouth of Sunshine Canyon. Realignment would also result in the landfill entrance being relocated approximately 50 feet southward of its present location. The final realignment of the access roadway would parallel the I-5 Freeway. Realignment of the access roadway would not result in additional grading and construction-related impacts beyond those described for earth resources, air quality, and noise within the Draft SEIR.

Transportation and Circulation (Public Transportation - Bus Lines, Rail and Light Rail) - Section 4.13.6 of the Draft SEIR

The proposed City/County Landfill Project would be consistent with the goals and policies of the Regional Mobility Element (RME)²⁷ and would not impact bus lines or rail and light rail service as discussed below.

Bus Lines. The proposed project is not anticipated to impact and/or affect any of the localized bus routes during construction or operation of the landfill facility since no service routes are located on roadways adjacent to the project site.

Rail and Light Rail. Due to the distance of the project site from existing rail lines and stations, the development and operation of the proposed project are not expected to disrupt service or impact the existing or proposed rail lines within the immediate area.

Public Services (Police) - Section 4.14.2 of the Draft SEIR

Environmental impacts were determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Development of the proposed City/County Landfill Project would require a minimal increase in service calls due to the presence of onsite security, existing perimeter fencing, and the remote location of the project site within a canyon area. In addition, the City Police Department was contacted as part of the

²⁷ Regional Mobility Element, Southern California Association of Governments. June 1994.

Notice of Early Consultation and Notice of Preparation process to assess any potential impact resulting from project implementation. The Police Department responded that it does not foresee an impact on its services and recommended that security measures be incorporated into the project.²⁸ This correspondence is included in the Draft SEIR, Volume II, Appendix A14.

**Public Services (Hiking and Equestrian Trails) -
Section 4.14.5 of the Draft SEIR**

Although the development of the proposed project would not be compatible with the development of two potential hiking/equestrian trails within Sunshine Canyon (as identified in the Rim of the Valley Trail Corridor Master Plan), even without implementation of the proposed project, these trails could not be developed due to the operation of the County Landfill. The development of hiking and equestrian trails in Sunshine Canyon with or without the development of the proposed project would be in conflict with existing, heavy industrial uses that occur as a result of landfilling operations.

The Master Plan identifies these potential trails as having the lowest rated priority for State acquisition. Highest acquisition priority has been given for the development of a trail in East Canyon. In response to regional hiking and equestrian trail needs, the County required that the project proponent dedicate acreage in East Canyon and upper Bee Canyon for hiking and equestrian uses. This dedicated acreage will provide regional hiking and equestrian trail linkage by connecting City-, County-, and State-proposed trails. The development of this trail connection within East Canyon and upper Bee Canyon would preclude the need for hiking and equestrian trails in Sunshine Canyon. No significant impacts on hiking/equestrian trail usage are anticipated as result of implementing the proposed project.

Hikers and equestrians utilizing the upper elevations of the existing O'Melveny Park hiking and equestrian trail would have limited views of the landfill at the latter stages of project development. No significant impacts to these trail users are anticipated after the implementation of dust, litter and aesthetic mitigation

²⁸ Captain David J. Kalish, City of Los Angeles Police Department, Planning and Research Division. Letter. August 11, 1992.

measures previously described.

Upon closure of the landfill, a final revegetation program would be implemented and a thick layer of native vegetation consisting of grasses, brush, and trees would be planted to blend in with the surrounding hillside topography. Potential impacts would be mitigated to a less than significant level upon the permanent closure of the landfill facility. Any impacts on hiking and equestrian trail users at the O'Melveny trail would therefore be eliminated. The proposed project would not have a significant impact on future users of the proposed County Gavin Canyon Trail since this proposed trail would not be located on BFI property and would be separated from the project site by an intervening ridgeline. Therefore, hiking and equestrian users on this proposed trail would not have a direct view of disposal operations.

Public Services (Libraries) - Section 4.14.6 of the Draft SEIR

The topical issue of libraries was determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Implementation of the proposed project is not expected to create additional demand on library services and/or resources contained therein due to the type of use (industrial versus residential) and the distance of the project site to the nearest libraries therefore no additional mitigation is required. The closest libraries within the City's jurisdiction include the Granada Hills Branch located at 10640 Petit Avenue and the Sylmar Branch located at 13059 Glenoaks Boulevard. These libraries are located approximately 5 miles from the project site.

Energy Conservation (Fossil Fuels) - Section 4.15 of the Draft SEIR

During construction approximately 2,914 gallons of fossil fuels (e.g., diesel fuel for heavy equipment and delivery trucks and gasoline for worker vehicles) would be consumed by the proposed project on a daily basis. During project operations, approximately 6,710 gpd of diesel fuels would be consumed by transfer trucks and refuse collection trucks and by operating heavy equipment during daily landfilling operations. During project operations, approximately 325 gpd of gasoline would be consumed on a daily basis by local delivery waste-hauling trucks, landfill employee commute trips, and local

service vehicles. Overall, during the operation of the proposed City/County Landfill Project, approximately 7,035 gpd of fossil fuels (diesel fuel and gasoline) would be consumed on a daily basis.

Since fuel consumed by existing transfer trucks and collection vehicles is already being expended during the collection and disposal of refuse within the region these trips are not actually considered new or augment the use of fuel. Additionally, because refuse haulers and the public would generally seek the most proximate location in which to deliver refuse, both an economic cost and fuel savings are expected. Given the size of the project and project needs, this amount of fossil fuel consumption is not considered wasteful, inefficient, or an unnecessary consumption of energy since onsite operational equipment is only used as warranted and employee trips are considered necessary therefore no additional mitigation measures are required.

Utilities (Natural Gas) - Section 4.16.2 of the Draft SEIR

Environmental impacts were determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Natural gas lines are not located on the project site nor are any planned extensions to existing gas lines in the project vicinity being proposed.

Utilities (Communication Systems) - Section 4.16.3 of the Draft SEIR

Environmental impacts were determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Based on the regional and local availability of communication infrastructure, telephone service can be readily extended to the project site by fiber optic cable that presently services the operational County Landfill.

Utilities (Sewers) - Section 4.16.5 of the Draft SEIR

Environmental impacts were determined not to be significant in the Initial Study and Checklist dated July 25, 1991. Refer also to the Draft SEIR, Appendix A7 and correspondence received from the County Sanitation

Districts of Los Angeles County.²⁹ The County Landfill currently has a septic leach field system for septic waste generated onsite. This system would be adequate to serve 35 additional employees, in addition to the 52 employees currently employed at the County Landfill. Therefore, development of the City/County Landfill would not result in further demand on the local or regional sewer system.

Utilities (Solid Waste) - Section 4.16.7 of the Draft SEIR

Solid waste disposal was determined not to be a significant issue in the Initial Study and Checklist because implementation of the proposed project would not result in a significant amount of solid waste generation. However, as a result of project development, construction debris would be generated during construction phasing and would include the following: vegetation removed for excavation and debris generated during construction. Additionally, during grading operations, noncompatible soils and oversized materials may require removal. All materials would be disposed of at the County Landfill or reused until the proposed project is deemed operational.

All construction and demolition wastes would include, but may not be limited to, inert solids comprised of rock, concrete, brick, sand, soil, asphalt, and sheetrock. The project proponent would utilize recyclable inert materials since these materials can be reused in other construction applications. Materials such as concrete, asphalt, dirt, and wood waste would be stockpiled and recycled. It is expected that no substantial volumes of inert materials would be generated and that, to the greatest extent possible, materials generated would be recycled onsite or disposed of at the County Landfill therefore no additional mitigation measures are required.

In addition, City/County Landfill employees would generate approximately 618 pounds (or 0.309 ton) of solid waste per day. Administrative/employee buildings would be provided with recycling bins. Solid wastes not recycled would be landfilled onsite. Therefore, no impacts on solid waste disposal (i.e., onsite) are

²⁹ David B. Lambert, Project Engineer, Financial Planning and Property Management Section, County Sanitation Districts of Los Angeles County. Letter. April 28, 1992.

anticipated.

**Cultural/Scientific Resources (Historical Resources) -
Section 4.19.3 of the Draft SEIR**

This topical issue was determined not to be significant in the Initial Study and Checklist since no historically significant structures exist on the project site.

**5.0 SIGNIFICANT OR POTENTIALLY SIGNIFICANT ENVIRONMENTAL EFFECTS
MITIGATED TO A LESS-THAN-SIGNIFICANT LEVEL**

The City has determined, based on the threshold criteria for significance initially presented in the Draft SEIR and subsequently presented in the Final SEIR, that the environmental effects listed below will clearly not exceed levels that have been determined by the City to be significant or, if significant, feasible mitigation measures have been identified in the SEIR that will result in the avoidance or substantial reduction of those effects to a less than significant level.

5.1 EARTH RESOURCES

5.1.1 Description of Potential Significant Effect: The proposed project would result in substantial grading and excavation that would alter the existing onsite topography and vegetation.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 1:** All grading activities shall be performed in accordance with the provisions of Division 70 of the City of Los Angeles Building Regulations, CCR Title 14, and with the rules and regulations as established by the City Department of Building and Safety.
- b. **Mitigation Measure No. 2:** Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the Department of Building and Safety shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the

project proponent and independently evaluated by the Department of Building and Safety.

- c. **Mitigation Measure No. 3:** During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled onsite for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e., 50 -100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14, certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated unless performed under the direction and specifications of a certified engineering geologist.
- d. **Mitigation Measure No. 4:** Grading that allows for construction of ancillary facilities outside of the landfill footprint or that has the potential to impact property beyond the boundary of the landfill shall be approved by the Department of Building and Safety.
- e. **Mitigation Measure No. 5:** All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed project, including provisions for excavation approved by the Department of Building and Safety, City Engineer, City Local Enforcement Agency (LEA) and other Responsible Agencies.
- f. **Mitigation Measure No. 6:** Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with the approved revegetation plan as approved by the City Building and Safety Department. Interceptor ditches shall be designed to divert storm runoff to a sedimentation basin.

- g. **Mitigation Measure No. 7:** Prior to the initiation of grading activities, the project proponent shall undertake, if necessary, reabandonment procedures as required by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to grading identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Project development would necessitate site grading to remediate existing geologic conditions; remove and recompact areas of noncompacted soil; remove debris, site vegetation, and other deleterious materials; and accommodate the development of landfill footprint, ancillary facilities, building pads, and internal circulation system.
2. Site grading for the proposed combined City/County Landfill footprint would result in the direct development of ±451 acres. Preliminary earthwork estimates for the proposed City/County Landfill footprint would include approximately 10,044,500 cubic yards (cu. yd.) of excavation material. Rough grading quantities would be balanced onsite.
3. Excavated soils would be used onsite for uses such as the liner foundation layer, liner operations layer, daily cover, intermediate cover, and the vegetative or erosion control layer of the final cover.
4. Development of the landfill would modify the physical form of the land area as construction occurs to the designated contour elevation of 2,000 feet above mean sea level (MSL) within the City portion of Sunshine Canyon within defined boundaries. The final landfill form would result in a small, relatively flat deck, providing a landfill crown area with side slopes tapering down to base-grade elevations in all directions. To the greatest extent feasible, this type of man-made feature would be engineered, constructed, and revegetated (i.e., interim and final) to blend in with natural landform relief of

the surrounding mountainous terrain.

5. Grading activities have the potential to affect previously abandoned oil and gas wells within Sunshine Canyon unless they are identified, tested, and possibly reabandoned in accordance with standards and procedures set forth by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.

Reference: For a complete discussion of impacts relating to Earth Resources (Grading Activities), please see Section 4.1.1 of the Draft SEIR and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Geologic Hazards - Mudflow and Landslide

- 5.1.2 **Description of Potential Significant Effect:** Grading and excavation for project development have the potential to uncover and affect landslide material.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 8:** When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled onsite for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.
- b. **Mitigation Measure No. 9:** Areas of excavation and areas of loose soil (i.e., around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.

Findings: Changes or alterations have been required in, or

incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to landslides identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Landslides have been identified within Sunshine Canyon (both City and County jurisdictions) by aerial photograph interpretation, detailed field mapping, and mapping of features exposed during site operations. The landslides are composed of matrix materials that include unconsolidated clay, sand, and boulders that enclose various sizes of sandstone, shale, and conglomerate blocks. The lithologic characteristics and positioning of the landslide masses indicate origins within the Towsley Formation. Landslide morphology appears to be controlled by slip along bedding planes or weak seams parallel to the bedding. Due to the favorable orientation of the geologic strata bedding, the footprint of the proposed City/County Landfill is relatively free of landslides.
2. One large landslide deposit was mapped in the area of the City/County boundary. The long axis of the landslide trends approximately southeasterly, and the maximum depth of the slide in that location ranges from approximately 40 to 70 feet. The landslide is a bedding plane block slide with movement along the bedding planes. The slide plane of this landslide is relatively shallow and will be excavated from the top down and completely removed. Construction that would occur within the landslide area would involve excavating the affected soils and ensuring that there are no resulting impacts on slope stability. The only other mapped landslide within the City is located southeast of the existing inactive landfill, and its removal would not impact project development.

Reference: For a complete discussion of impacts relating to Earth Resources (Mudflow and Landslide, including lithologic history), please see Section 4.1.2 of the Draft SEIR and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Geologic Hazards - Seismicity

5.1.3 Description of Potential Significant Effect: Potential seismic hazards would include primary fault rupture, secondary ground rupture, and strong shaking.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 10:** The landfill facility shall be designed and constructed to meet CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the project proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states "new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . ." The landfill design and seismic analysis will be reviewed by the RWQCB.
- b. **Mitigation Measure No. 11:** An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter scale or greater near the project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered structures shall be based on the results of the detailed stability analyses of potential seismic events.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to seismic activity identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The most significant geologic hazard to the proposed

project would be the potential for moderate to severe seismic shaking and associated ground rupture that is likely to occur during the design life of the Sunshine Canyon Landfill project. The project site is located in the highly seismic Southern California region within the influence of several fault systems that are considered active or potentially active. The San Fernando-Sierra Madre Fault, with a site-to-source distance of 3.0 miles is the closest fault to the project site. In addition to known faults that could impact the site, recent research indicates that "blind faults" (faults that apparently have not broken the surface and display little or no surface expression) may underlie the Los Angeles Basin and adjacent areas.

2. Strong shaking can result in damage to the landfill waste containment system due to seismically induced displacement of the waste mass. Strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment systems (i.e., the liner, cover, leachate collection and removal, gas extraction, and surface water drainage systems).

Reference: For a complete discussion of impacts relating to Earth Resources (Seismicity), please see Section 4.1.3 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; Topical Issue 1: Seismicity and Topical Issue 2: Landfill Stability During Northridge Earthquake.

Geologic Hazards - Liquefaction

- 5.1.4 Description of Potential Significant Effect:** Potential ground failure due to liquefaction could occur at the project site.

Mitigation Measures: Based on the analysis presented in the Final SEIR the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 12:** Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify

that all alluvium within the landfill footprint has been removed prior to placement of any compacted fill or construction of any containment system elements.

- b. **Mitigation Measure No. 13:** The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction-related impacts.
- c. **Mitigation Measure No. 14:** The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to liquefaction identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Ground failure due to liquefaction is a process whereby water-saturated, loosely consolidated, cohesionless sediments lose strength and subsequently fail due to the strong shaking from earthquakes. The hazards associated with liquefaction range from minimal ground cracking to sand boils, lateral spreads, and slumping. At the project site, the potential occurrence of liquefaction is limited chiefly to the water-saturated alluvium located at depths of less than 30 feet in the canyon bottoms. These alluvial deposits would be removed during site preparation.

Reference: For a complete discussion of impacts relating to Earth Resources (Liquefaction), please see Section 4.1.5 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Geologic Hazards - Slope Stability

- 5.1.5 Description of Potential Significant Effect:** Potential slope failure could occur in the steeper areas within Sunshine Canyon.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 15:** Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.
- b. **Mitigation Measure No. 16:** Final cut-and-fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.
- c. **Mitigation Measure No. 17:** Final slopes shall be engineered to have a static factor of safety of at least 1.5.
- d. **Mitigation Measure No. 18:** Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City LEA.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to slope failure identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related feasible mitigation measures are presented in support of these findings:

1. Several small to moderate landslides occurred within the County portion of Sunshine Canyon following the 1971 San Fernando earthquake. Several small rock falls occurred within the City portion of Sunshine Canyon, and several small to moderate landslides occurred in steep drainage areas within the County portion following the 1994 Northridge earthquake. However, all engineered cut-and-fill slopes remained stable during both the San Fernando

and Northridge events.

2. Although the natural slopes on the site are considered to be relatively stable, the past occurrences of seismically induced slope failures suggest that there is a potential for future slope failures in the steeper areas within Sunshine Canyon. Little evidence has been found by consulting geologists that might indicate the presence of recent downslope failures in the larger, older landslide deposits. The absence of instability in the older landslide deposits indicates that their present configurations are in static equilibrium.
3. Canyon slopes at the project site are sometimes steeper than 1H:1V (horizontal to vertical), although they are typically 2H:1V. Stability analysis of existing landslides indicates that, unless adverse (out-of-slope) bedding conditions are present, 1H:1V slopes in the native material are stable under both static and seismic loading. When adverse bedding is present, slope angles of 2H:1V or flatter may be required to provide adequate static stability. Pseudo-static stability analyses for seismic loading and observations of the performance of slopes at the site during the San Fernando and Northridge earthquakes indicate that, when natural slopes at the project site have adequate static stability, the slopes perform well under seismic loading.

Reference: For a complete discussion of impacts relating to Earth Resources (Slope Stability), please see Section 4.1.6 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 2: Landfill Stability During Northridge Earthquake.

5.2 AIR QUALITY (ODOR)

- 5.2.1 Description of Potential Significant Effect:** Waste materials received daily at the proposed landfill and landfill gases (LFGs) resulting from decomposing wastes have the potential to emit detectable odors.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 29:** The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided.

However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.

- b. **Mitigation Measure No. 30:** Operational techniques shall be used to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.
- c. **Mitigation Measure No. 31:** Solid waste shall be compacted within 1 hour of its arrival at the working face.
- d. **Mitigation Measure No. 32:** The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.
- e. **Mitigation Measure No. 33:** If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.
- f. **Mitigation Measure No. 34:** To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include the following:
 - Sample Probe Installation: One monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils.

- Integrated Landfill Surface Samples: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm.
 - Ambient Air Samples: 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.
 - Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.
 - Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.
- g. **Mitigation Measure No. 35:** LFG flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Local Enforcement Agency. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to odors identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Two potential sources of odors are generally associated with most landfilling operations. The first source of odor is directly related to the specific types of refuse brought to the landfill prior to emplacement, compaction, and the application of daily cover material. The second source of odor is from the methane-related gases produced from the anaerobic (oxygen-free) microbial decomposition of organic matter in refuse that produces natural LFGs.
2. The first potential source of odor is primarily based on factors that include the type of materials comprising waste, age of the refuse, acidic content of the waste (pH level), moisture content in the refuse, degree to which the refuse is compacted at the landfill, particle size, temperature, and degree of mixing and types of organics present.
3. The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain (1,700 feet to the nearest residence) so that no odor nuisance from refuse emplacement should occur. Additional barriers include the inactive landfill, which is approximately 300 feet in height, and a ±100 acre buffer area. These two features pose sufficient screening and distance to inhibit the transmission of odors beyond the project site boundaries.
4. Carbon Dioxide (CO₂) (38 to 46 percent) and methane (53 to 60 percent) are the two main constituents of the natural LFGs produced, neither of which has a perceptible odor to humans. However, trace amounts of other gases that are malodorous are also produced during anaerobic decomposition. As the natural gases are generated within the landfill cells, internal landfill cell pressures move the gases within and away from the landfill along paths of least resistance. Generally, anaerobic processes begin locally and are then followed by the depletion of oxygen in isolated pockets. Processes peak in CO₂ production which typically occurs approximately 11 to 40 days after refuse emplacement. The methane-forming microorganisms begin formation approximately 1 to 2 years after landfilling. Odors can occur when the landfill surface, due to differential waste settlement, subsidence, or cracks, allows the LFG to escape into the atmosphere.

Reference: For a complete discussion of impacts relating to

Air Quality (Odor Impacts), please see Section 4.2.13 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 4: Landfill Gas Generation and Odor Control.

5.3 SURFACE AND GROUNDWATER

5.3.1 Description of Potential Significant Effect: Implementation of the proposed project would change the existing surface water patterns and hydrologic conditions at the project site. Construction grading and the removal of surficial vegetation would remove existing barriers that currently act to dissipate (i.e., slow down and reduce) water runoff from the site. As a result, the proposed project has the potential to increase the surface water runoff and peak discharge, increase erosion and sediment transport, and decrease surface water quality due to increased sediment loads.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 36:** To ensure that infiltration of surface water into the closed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the project site entrance.
- b. **Mitigation Measure No. 37:** As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. Onsite drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.
- c. **Mitigation Measure No. 38:** Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage facilities

consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff. Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into Sedimentation Basin A. Diversion ditches shall convey surface runoff from the undisturbed areas to the permanent perimeter ditches for safe transport around the landfill footprint. Surface covers of various types, from mulches to vegetation, shall be used to retard erosion from areas of disturbance. In addition, areas of disturbance shall be kept at a minimum during active filling operations.

- d. **Mitigation Measure No. 39:** As filling operations progress upward in elevation and laterally across the canyon, both permanent and temporary drainage facilities shall be used to provide appropriate drainage protection. The lower-elevation portions of the landfill working face shall be placed under final cover as soon as final grade is attained, and bench ditches shall be installed that will connect to adjacent, permanent perimeter ditches. These ditches shall connect directly to the temporary diversion drainage ditches that will protect the active landfill areas from natural surface runoff.
- e. **Mitigation Measure No. 40:** In order to monitor the effectiveness of those measures designed to prevent pollution from entering the offsite stormwater system, the project proponent shall be required to apply for coverage under the SWRCB's General Construction Activities Stormwater Permit Programs.
- f. **Mitigation Measure No. 41:** The surface water collection system shall be designed to collect runoff and collect/retain suspended solids. Water leaving the sedimentation basins shall be monitored in accordance with NPDES requirements.
- g. **Mitigation Measure No. 42:** Surface water quality shall be monitored by collecting water samples from the sedimentation basins to ensure that water quality protection standards (contaminant levels) as determined for the site by the LARWQCB are not exceeded.
- h. **Mitigation Measure No. 43:** Sediment shall be cleaned out of the sedimentation basins after every significant storm.

- i. **Mitigation Measure No. 44:** The final landfill cover shall be compacted and graded with a minimum 3-percent gradient to preclude percolation of rainwater and direct surface water runoff away from the landfilled refuse and into drains that ultimately discharge into the monitored sedimentation basins.
- j. **Mitigation Measure No. 45:** An erosion control plan would be implemented by the project proponent to prevent stormwater pollution from construction activity. Construction materials, equipments and vehicles would be stored or parked in areas protected from stormwater runoff. Construction material loading and unloading would be in designated areas to minimize any washout due to stormwater runoff. Pre-construction controls would be implemented to include the use of a sandbagging system, including sandbag check dams and sandbag desilting basins, which would be used to limit runoff velocities and minimize sediment in stormwater runoff.
- k. **Mitigation Measure No. 46:** A preventive maintenance program would be implemented by the project proponent, including inspection of facility equipment, systems, and stormwater management devices to detect conditions that may cause breakdowns or failures resulting in discharge of materials into stormwater. This program applies to the onsite drainage ditches; rip-rap; berms and dikes; dust control; silt fences; diversion grading; and pavement surfaces. Each system and piece of equipment would be inspected monthly. Procedures for inspection would vary due to the piece of equipment or system. However, the major elements of the inspection program would include checking for cracks or structural failures, inspecting parts or pieces of equipment nonfunctioning, checking for the degradation or deterioration of operating units, and investigating the need for cleaning or emptying units.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to surface water identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A small portion of the project site (i.e., near the bottom of the canyon where the creek flows offsite) is designated in Zone A in the 1980 version of Panel 0005C of the floodplain maps. Zone A is classified for a 100-year floodplain.
2. Surface water runoff from precipitation, flow from tributary channels, and erosion caused by these flows converge at the mouth of Sunshine Canyon near the landfill entrance. Currently, surface water from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin and periodically monitored under the stormwater monitoring plan for the operational County Landfill. This sedimentation basin was designed to control the sediment load transported by surface water runoff and contain the ultimate peak discharge from both a 50-year, 96-hour storm event (the Los Angeles County standard) and a 100-year, 24-hour storm event (the State Water Resources Control Board [SWRCB] standard).
3. Offsite, surface water from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City Bureau of Engineering (BOE). The culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, surface water enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County Department of Public Works (DPW), Flood Control Division. Surface water then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the U.S. Army Corps of Engineers (Corps). Both the Bull Creek Flood Control Channel and the Sepulveda Dam have sufficient volume capacity to accommodate regional stormwater flows.
4. The existing inactive landfill has numerous drainage control improvement features, such as benches, interceptor ditches, and concrete drainage channels, to divert surface water runoff away from the landfill.

These control improvements are maintained regularly and closely monitored during the rainy season so that any necessary repairs or maintenance can be performed in an expeditious manner. Any areas of ponding or erosion damage on the existing inactive landfill are repaired upon discovery and as weather permits.

5. All wastewater discharges in the Los Angeles region whether of surface or groundwaters are subject to Waste Discharge Requirements (WDRs), which are submitted and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). In addition, the U.S. Environmental Protection Agency (USEPA) has delegated responsibility to the State and LARWQCB for implementation of the federal National Pollutant Discharge Elimination System (NPDES) program. The WDRs for discharges to surface waters also serve as NPDES permits. These programs are intended to regulate controllable discharges. It is illegal to discharge wastes into any waters of the State without obtaining appropriate WDRs or NPDES permits.
6. Basic NPDES component requirements include discharge limitations, standard requirements and provisions outlining the discharger's general discharge requirements and monitoring and reporting responsibilities, and a monitoring program to collect and analyze samples and submit monitoring reports to the LARWQCB.
7. The general NPDES permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that emphasizes stormwater best management practices (BMPs). New dischargers must submit a Notice of Intent (NOI) and develop and implement an SWPPP prior to commencement of operations. All dischargers must prepare, retain onsite, and implement an SWPPP. The NOI is a standard set of forms (including an accompanying site plan) that provides basic information about the landfill facility, its location, and potential for stormwater discharge. In general, the SWPPP describes site conditions and activities that identify sources of pollution that may affect stormwater discharge quality, describes appropriate stormwater management practices that would reduce pollution in stormwater discharges, certifies that nonstormwater discharges have been eliminated, and provides annual verification through onsite inspection that all elements of the SWPPP are in compliance. The SWPPP for the operating County Landfill

is retained onsite.

8. The project site is within the 900-square-mile (sq. mi.) Los Angeles River Watershed Basin and the Sunshine Canyon watershed. The Los Angeles River is the major drainage system in this basin. The upper reaches of the river carry urban runoff and flows from the San Fernando Valley. Below the Sepulveda Dam, flows are dominated by tertiary-treated effluent from several municipal wastewater treatment plants. Because the watershed is highly urbanized, urban runoff and illegal dumping are major contributors to water quality impairment. See also the Responses to Comments in the Final SEIR, Topical Issue

Reference: For a complete discussion of impacts relating to Surface and Groundwater (Surface Water), please see Section 4.3.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 5: Stormwater Runoff Control Measures.

Groundwater

- 5.3.2 **Description of Potential Significant Effect:** Leachate from saturated refuse has the potential to migrate and degrade the existing groundwater quality. In addition, the installation of a 12,000-gallon underground tank diesel fuel storage tank has the potential to degrade existing groundwater, if ruptured.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 47:** In compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, § 258.40 (Design Criteria), the proposed City/County Landfill shall install a composite liner system consisting of two components: (1) the upper component shall consist of a minimum 30-mil flexible membrane liner (FML), and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is utilized, it shall be at least 60 mils thick. If a thinner soil barrier layer of

lower permeability is utilized, it shall have equal or superior containment capability. The FML component shall be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill shall have a LCRS that shall consist of either a granular layer 1-foot minimum in thickness or a geosynthetic alternative with an equivalent flow capacity, and a minimum 2-foot thick protective soil cover over which refuse will be placed. There shall also be a protective toe berm at the landfill terminus.

- b. **Mitigation Measure No. 48:** In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the composite liner system that shall be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system to be constructed shall be described in detail in the project proponent's ROWD for the landfill facility. The liner systems shall be constructed and field tested in accordance with strict quality assurance/quality control (QA/QC) procedures pursuant to criteria submitted to and approved by the LARWQCB prior to construction.
- c. **Mitigation Measure No. 49:** Areas of natural groundwater seepage shall be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains shall be placed in areas where seeps and springs have been identified, and they shall collect and convey any water from these sources to the sedimentation basin. In the event any chemical constituents are in the seep water, the seep waters will be sampled, analyzed, collected, and then sent either to the onsite leachate treatment facility or offsite for proper treatment and disposal. The nature and source of the seep would be investigated, including additional sampling and laboratory testing.
- d. **Mitigation Measure No. 50:** The LCRS shall be installed at the base and side slopes of the landfill. This system shall be designed and installed to collect generated leachate for disposal consistent with LARWQCB requirements. The collection system shall consist of a filter rock blanket embedded with a system of collection pipes or a geosynthetic alternative that collects and transports the fluid to a holding tank. In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the collection systems shall be designed to limit the hydraulic head on the liner to less than 12 inches. Collection pipes shall

be sized and spaced to reduce the hydraulic head in the leachate collection system as specified in the WDRs. Leachate shall be recovered and treated onsite. The treated leachate shall be sampled on a regular basis to affirm suitability for reuse onsite.

- e. **Mitigation Measure No. 51:** Final design and operating conditions for the leachate removal and treatment system shall be as specified by the LARWQCB in the proposed landfill's WDRs. The LCRS shall be designed and installed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 4, § 2543 (Leachate Collection and Removal Systems), which requires that the LCRS be designed, constructed, maintained, and operated in a manner that collects and removes twice the maximum anticipated daily volume of leachate from the waste management unit.
- f. **Mitigation Measure No. 52:** A gas collection layer shall be placed beneath the liner system where it overlies the existing inactive landfill to mitigate the potential for LFG migration.
- g. **Mitigation Measure No. 53:** The existing groundwater monitoring wells located within the City portion of Sunshine Canyon shall continue to be monitored during the development of the proposed project. The monitoring system may be revised as construction progresses in the areas where wells are located as approved by the LARWQCB.
- h. **Mitigation Measure No. 54:** A preliminary closure/postclosure plan shall be provided as part of the operating permit for the landfill. Closure regulations are contained in the CCR, Title 23, Division 3, Chapter 15, Article 8 (Closure and Postclosure Maintenance), § 2580 (General Closure Requirements) et seq. Completion of landfiling operations will occur once final approved elevations are reached.
- i. **Mitigation Measure No. 55:** The design, operation, and final closure of the landfill project shall be monitored by the City LEA, CIWMB, and LARWQCB to ensure that the landfill will not create significant environmental impacts on local or regional water supplies.
- j. **Mitigation Measure No. 56:** Application of daily, intermediate, and final covers in accordance with applicable regulatory requirements shall aid to restrict

leachate formation by inhibiting the infiltration of water into the landfill waste prism.

- k. **Mitigation Measure No. 57:** Dust control water shall be applied to wet only the upper soil surface.
- l. **Mitigation Measure No. 58:** The project shall be operated as a Class III landfill and shall not accept hazardous materials or liquid waste. Further restrictions will be identified in the future WDRs required prior to project development.
- m. **Mitigation Measure No. 59:** Underground diesel fuel storage tanks will be installed, monitored, and inspected in compliance with CCR Title 23, Division 3, Chapters 16 and 17, and City of Los Angeles Municipal Code Sections 57.31.34 through 57.39.18. Underground tanks would be double-walled and have sufficient secondary containment and a leak interception and detection system to prevent fluid migration.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to groundwater quality identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

- 1. The site is located within the San Fernando Hydrologic Subarea of the San Fernando Valley Groundwater Basin, Sylmar Subbasin. Volatile organic compounds (VOCs) and nitrates from industry, subsurface sewage disposal, and past agricultural activities are the primary pollutants of the San Fernando Valley Groundwater Basin. Designated potential beneficial uses of groundwater within the subarea include municipal, industrial, and agricultural water supply.
- 2. Groundwater at the project site generally flows in a south to southeast direction toward the mouth of Sunshine Canyon. Results of the drilling program and subsequent water level readings indicated that confined groundwater conditions may exist at numerous locations within the project site. Groundwater in the uppermost aquifer occurs under unconfined conditions in the alluvial

sediments and generally under confined conditions in the top weathered zone of the Towsley Formation. The lower bedrock zone was found to occur under confined conditions. Available groundwater studies indicate that potentially limited groundwater resources lie beneath the project site. Any possibility for groundwater migration has been effectively cut off due to the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill.

3. Numerous springs and seeps have been discovered primarily in the County portion of Sunshine Canyon. The potential exists for these springs and seeps to occur within the project site. Generally, these springs and seeps are exposed during construction, grading, and removal of the alluvial materials during excavation activities. A subdrain system was installed beneath the operating County Landfill to capture and control springs and seeps and convey water into the existing sedimentation basin.
4. Currently, 22 groundwater monitoring wells are installed at the project site to monitor groundwater conditions and water quality. Since installation, groundwater has been sampled and analyzed quarterly for possible contamination. This network also includes leachate monitoring wells and a groundwater extraction trench. Results of the testing on both surface and groundwater samples indicated that the waters of the Sunshine Canyon watershed are of poor quality and unfit for use as a drinking water source. Concentrations of constituents in the groundwater, including chloride and VOCs, have been detected at the project site.
5. The vadose zone is monitored quarterly by five lysimeters that have been installed within Sunshine Canyon. The vadose zone is defined as the area below the landfill and above groundwater where water may be present or suspended in the weathered bedrock or soil. The presence or absence of this water is monitored through the use of lysimeters, which are special wells designed to permit the measurement of water that may be in the pores of the

soil or weathered bedrock above the groundwater zone. These wells provide monitoring of the alluvial deposits to detect seasonal flow within Sunshine Canyon. Quarterly monitoring results (since lysimeter installation) have indicated that no liquid or moisture is present. For the proposed City/County Landfill, lysimeters will not be part of the landfill's groundwater monitoring network. Instead, the vadose or unsaturated zone will be monitored with perimeter gas probes placed outside the liner system and into the gravel subdrain. Monitoring at the County Landfill is accomplished by sampling the underdrain system outfall points instead of lysimeters. For both areas, sampling is performed quarterly and findings are reported to the LARWQCB.

6. Excess water use or water spreading at or near the landfill may result in leachate generation and have an adverse impact on the existing groundwater conditions. Excess water used for irrigation on slopes to support vegetative growth and dust control could create the potential for leachate formation within the landfill mass.

Reference: For a complete discussion of impacts relating to Surface and Groundwater (Groundwater), please see Section 4.3.2 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; Topical Issue 6: Hydrogeologic Relationship between Sunshine Canyon and the San Fernando Valley Groundwater Basin, Topical Issue 7: Groundwater Protection, Topical Issue 8: Landfill Liner Design, and Topical Issue 9: Leachate Generation, Collection, and Treatment.

5.4 BIOLOGICAL RESOURCES

Vegetation and Wildlife Habitat

- 5.4.1 Description of Potential Significant Effect:** Development of the proposed project would disturb existing plant communities, sensitive wildlife species, and habitat that supports sensitive plant or wildlife species.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

Venturan Coastal Sage Scrub

- a. **Mitigation Measure No. 60:** A detailed conceptual mitigation plan shall be prepared by the project proponent and contain specific information on planting, maintenance, and monitoring. A revegetation plan that includes coastal sage scrub restoration can feasibly occur onsite. The implementation of this plan will provide onsite mitigation greater than 1:1 to offset the loss of coastal sage scrub.
- b. **Mitigation Measure No. 61:** Surface soils and seed sources will be gathered from areas of the project site and spread within onsite mitigation areas.

Slender Mariposa Lily

- c. **Mitigation Measure No. 62:** A conceptual mitigation plan for transplanting relocated lilies shall be developed by consulting biologists. That plan shall describe transplantation techniques, monitoring, and provide data required by Responsible Agencies during a 5-year monitoring period.

San Diego Horned Lizard

- d. **Mitigation Measure No. 63:** Impacts on the San Diego horned lizard can be mitigated to a level of less than significant by restoring coastal sage scrub habitat. This will create a temporal loss of the species, but the population should recover following restoration of this habitat. Topsoils should be selected that are friable to suit lizard habitat requirements.

California Gnatcatcher

- e. **Mitigation Measure No. 64:** Surveys shall be conducted for California gnatcatchers prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in accordance with USFWS protocol and, if present, a Section 10(a) permit from the USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., March through July), a federally permitted biologist will survey areas of project development to determine whether the species is present. If California gnatcatchers are present, onsite grading activities shall cease until USFWS officials are notified. Either additional coastal sage scrub restoration or the purchase of suitable offsite habitat

will be required if California gnatcatchers are found onsite.

Least Bell's Vireo

- f. **Mitigation Measure No. 65:** Surveys shall be conducted for Least Bell's vireo prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in all areas of potential habitat. If this species is present onsite, a Section 10(a) permit from the USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., April through July), a biologist will survey areas of project development to determine if the species is present. If present, onsite grading activities shall cease until USFWS officials are notified.

Western Burrowing Owl

- g. **Mitigation Measure No. 66:** Preconstruction surveys shall be conducted by a consulting biologist at least 30 days prior to project grading to determine if the species is within the project site. If surveys indicate the presence of western burrowing owls, a relocation program shall be implemented.

Migratory Bird Treaty Act

- h. **Mitigation Measure No. 67:** To prevent the loss of an active migratory bird nest, vegetation shall not be cleared during the breeding season (i.e., March 15 to August 1). If vegetation clearing needs to occur, surveys shall be conducted by biologists to determine active migratory bird nests. All active migratory bird nests shall be protected until the young become independent.

Raptor Nests

- i. **Mitigation Measure No. 68:** If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the non-

breeding season.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to biological resources identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Twenty-five biological surveys have been conducted for the project site between 1978 and 1996.
2. The following plant communities have been identified on the project site: arroyo willow series (4.8 acres), southern willow scrub (1.9 acres), mulefat scrub (1.5 acres), Coast live oak woodland (45.3 acres), Southern California black walnut woodland (1.9 acres), Venturan coastal sage scrub (160.0 acres), chamise chaparral (9.5 acres), big-cone Douglas fir forest (3.1 acres), and nonnative grassland (19.7 acres). In addition, three other areas comprised of ornamental plantings (9.0 acres), the existing landfill (278.9 acres), and a mitigation area (0.3 acres) are located within the project site.
3. Ten species of amphibians are associated with the identified onsite habitats. These include five species of newts and salamanders, three species of toads, and two species of tree frogs. Of these, four species were observed, including ensatina (*Ensatina eschscholtzi*), black-bellied slender salamander (*Batrachoseps nigriventris*), western toad (*Bufo boreas*), and Pacific chorus frog (*Pseudacris regilla*).
4. Five species of lizards were observed onsite, including the western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), and southern alligator lizard (*Gerrhonotus multicarinatus*).
5. Ninety-four bird species were observed, and an additional 49 species were identified as potentially occurring in

the project boundaries. Birds commonly observed in the arroyo willow series and southern willow scrub habitats include black phoebe (*Sayornis nigricans*), black-headed grosbeak (*Pheucticus melanocephalus*), bushtit (*Psaltiriparus minimus*), lesser goldfinch (*Carduelis psaltria*), Bewick's wren (*Thryomanes bewickii*), song sparrow (*Melospiza melodia*), and house finch (*Carpodacus mexicanus*). The Coast live oak woodland habitat supports a wide diversity of birds, including the western scrub-jay (*Aphelocoma californica*), acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Picoides nuttallii*), plain titmouse (*Parus inornatus*), and phainopepla (*Phainopepla nitens*). Coastal sage scrub provides habitat for many species, including the California quail (*Callipepla californica*), Bewick's wren, California towhee (*Pipilo crissalis*), and lesser goldfinch. Bird species commonly observed in the chamise chaparral habitat include Anna's hummingbird (*Calypte anna*), western scrub-jay, Bewick's wren, bushtit, wrentit (*Chamaea fasciata*), and spotted towhee (*Pipilo maculatus*). Within the nonnative grasslands, the red-tailed hawk (*Buteo jamaicensis*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), and house finch were commonly observed. Birds commonly identified in the existing inactive landfill and ornamental planted areas include the rock dove (*Columba livia*), Say's phoebe (*Sayornis saya*), common raven, house finch, lesser goldfinch, Anna's hummingbird, and mourning dove.

6. The following raptor species were observed onsite: the white-tailed kite (*Elanus leucurus*), Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), red-tailed hawk, golden eagle (*Aquila chrysaetos*), American kestrel (*Falco sparverius*), prairie falcon (*Falco mexicanus*), and turkey vultures (*Cathartes aura*). In addition, the northern harrier (*Circus cyaneus*) was observed adjacent to the project site.
7. Seventeen species of mammals were observed, and 38 additional species are considered to be potentially occurring. Mammals most commonly observed include the western gray squirrel (*Sciurus griseus*), California ground squirrel (*Spermophilus beecheyi*), Merriam's chipmunk (*Tamias merriami*), desert cottontail (*Sylvilagus audubonii*), racoon (*Procyon lotor*), and mule deer (*Odocoileus hemionus*).

8. During field surveys, two sensitive plant species were located onsite: the southern California black walnut (*Juglans californica* var. *californica*) and the slender mariposa lily (*Calochortus catalinae* var. *gracilus*).
9. Forty-seven sensitive wildlife species are known to occur or potentially occur onsite. During field surveys, the following 10 sensitive species were observed: coastal western whiptail (*Cnemidophorus tigris multiscutatus*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), yellow warbler (*Dendroica petechia*), California horned lark (*Eremophila alpestris actia*), loggerhead shrike (*Lanius ludovicianus*), Cooper's hawk, golden eagle, white-tailed kite, and prairie falcon.
10. The proposed project would impact ±3 acres of arroyo willow series, ±0.3 acre of southern willow scrub, ±31 acres of Coast live oak woodland, ±0.3 acre of black walnut woodland, ±82 acres of Venturan coastal sage scrub, ±5 acres of chamise chaparral, ±3 acres of big-cone Douglas fir trees, ±9 acres of nonnative grasslands, ±0.7 acre of ornamental plantings, ±0.3 acre of mitigation area, and ±125 acres of the existing inactive landfill. Total project impact is ±259 acres.
11. Two populations of slender mariposa lily would be directly impacted by project development. These populations are located within the northern portion of the project site within City jurisdiction.
12. Development of the project within the City portion of Sunshine Canyon could potentially disturb suitable habitat for the San Diego horned lizard.
13. Because disturbances would occur to sensitive plant communities, such as the Venturan coastal sage scrub and this habitat is suitable for California gnatcatchers, potential impacts may result. However, no gnatcatchers have been observed onsite during the numerous field surveys that have been conducted by consulting biologists.
14. Potential breeding habitat for the least Bell's vireo exists onsite within the southern willow scrub and arroyo willow series habitats. This species was not observed during focused field studies conducted by consulting

biologists.

15. Potential breeding habitat exists onsite for the western burrowing owls. This species was not observed during field studies by consulting biologists.
16. Potential impacts could occur to native migratory birds and their nests during the breeding season.
17. Project development could result in the removal of active raptor nests.
18. The removal or alteration of wildlife habitats within the project site would result in the loss of small mammals, reptiles, amphibians, and other animals of slow mobility that live in these habitats, primarily within the proposed development limits of the landfill footprint, ancillary facilities, and related areas. More mobile wildlife species that currently occupy or use the project site would be forced to move into remaining areas of open space or other habitats, consequently increasing competition for available resources in those areas. This situation could result in the loss of individual wildlife populations that cannot successfully compete.

Reference: For a complete discussion of impacts relating to Biological Resources (Vegetation and Wildlife Habitat), please see Section 4.4.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 10: Sensitive Biological Habitats.

Wetlands and Riparian Habitat

- 5.4.2 Description of Potential Significant Effect:** Stream zones and wetland areas located within the proposed landfill footprint and external to that area (to provide for ancillary facility construction) would be graded, filled, or disturbed as a result of landfilling.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 69:** Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies for consideration to compensate for impacts on riparian and wetland resources as a result of project development.

These sites include Bull Creek, Bee Canyon and East Canyon, which are located proximate to the project site. Prior to the development of any detailed mitigation plans and drawings, the final selection will be determined cooperatively by the CDFG, Corps, SWRCB, and other regulatory agencies in conjunction with the City and project proponent.

- b. **Mitigation Measure No. 70:** If a potential candidate site is unavailable, the project proponent would purchase wetland credit through an established mitigation bank. The project proponent would be required to pay an amount established by the mitigation bank developer (i.e., public, non-profit, or private entity) as compensatory mitigation.
- c. **Mitigation Measure No. 71:** Under the direction of the Corps, the project proponent would seek authorization under Regional General Permit No. 41, which would allow the mechanized removal of invasive, exotic plants (e.g., giant reeds [*Arundo donax*] and salt cedar [*Tamarix* spp.]) from waters of the U.S., including wetlands within the jurisdiction of the Los Angeles District of the Corps.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to wetland and riparian habitat identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A streamzone assessment was conducted in 1995 that identified the presence of drainage courses, hydrophytic vegetation, and hydric soils (indicating potential Corps jurisdiction) and identified two types of riparian habitat: arroyo willow riparian forest (woodland) and southern willow scrub. The total extent of riparian habitat remaining within the City portion of the Sunshine Canyon project area is approximately ± 5.0 acres, and the potential jurisdictional waters of the United States and wetlands totaled approximately 4.20 acres.
2. Development of the proposed City/County Landfill would include the removal of ± 2.95 acres of jurisdictional waters, wetlands, and riparian habitat. Impacts on these

resources would occur as a result of the construction and excavation for the landfill footprint, ancillary facilities, and environmental control features, which would prevent the reestablishment of replacement resources on site. Mitigation in the form of acquisition of potential mitigation sites or the purchase of wetland credit through an established mitigation bank will result in no net loss of wetland habitat.

Reference: For a complete discussion of impacts relating to Biological Resources (Wetlands and Riparian Habitat), please see Section 4.4.2 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 12: Wetlands.

Native and Nonnative Tree Resources

5.4.3 Description of Potential Significant Effect: Implementation of the proposed project would require the removal of 675 native and nonnative trees.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 72:** Native tree species shall be replaced at a 2:1 (replacement:removal) ratio, consisting of 15-gallon or 5:1 3-gallon container trees. Mitigation trees shall be planted prior to impacted trees being removed, thus allowing trees to grow to specimen size in the field. A specimen-size tree shall be defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above ground. All mitigation trees shall be specimen size within 1 year after tree removal.
- b. **Mitigation Measure No. 73:** Nonnative tree species shall be replaced at a 2:1 ratio, consisting of 3-gallon Coast live oak trees. A total of 100 24-inch box and 25 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio shall be reduced by 125 trees to account for the inclusion of these larger trees.
- c. **Mitigation Measure No. 74:** Mitigation tree planting shall occur within the 100± acre open space area located

south of the existing inactive landfill. Appropriate planting locations shall be selected within the buffer area based on soil type, steepness of the slope, and aspect (i.e., location and/or direction of the sun).

- d. **Mitigation Measure No. 75:** Prior to tree planting, the mitigation site shall be prepped to create an environment favorable for native and nonnative tree growth and survival. The initial step in tree planting is to clear away unwanted grass, weeds, or brush. A minimum 3-foot radius of vegetation shall be cleared around the planting location. All planting holes shall be dug to a minimum depth of 24 inches. If soil conditions cannot accommodate the minimum depth, planting holes shall be relocated to a more suitable location. Trees will be spaced 15 to 20 feet in a random, nongeometric pattern. Row or grid spacing will be avoided to provide a natural look to the mitigation planting.
- e. **Mitigation Measure No. 76:** A poultry wire screen with 1-inch-diameter holes shall be installed around the outside wall of the tree planting hole and folded closed on the bottom. The screen shall extend downward to enclose the root ball of the tree that will protrude 1 foot above final grade.
- f. **Mitigation Measure No. 77:** Backfill material shall be used for planting material and shall consist of loose friable soil. The planting shall be backfilled to a depth that allows the root crown of the plant to be even with or slightly higher than the surrounding grade. All planting locations shall be preirrigated to ensure that moisture levels are at or near capacity.
- g. **Mitigation Measure No. 78:** Prior to tree planting, all containers shall be thoroughly soaked. Once at the mitigation site, trees shall not be removed from their containers until all site preparation work has been completed. The wire cage shall be installed around the planting hole, and backfill material shall be filled to one-half the depth of the root wad. A 27-gram Agriform fertilizer tablet shall be placed approximately 1 inch from the root wad. Backfilled soil shall be tamped and soaked to remove any air pockets.
- h. **Mitigation Measure No. 79:** Following tree planting, the area shall be mulched with either wood chip or recycled green waste. The mulch shall be applied in an even layer

approximately 6 inches or more in thickness.

- i. **Mitigation Measure No. 80:** Drip irrigation shall be provided for all planted trees to ensure adequate growth and allow year-round planting. The irrigation system shall include a liquid fertilizer injection system to maintain optimum plant health and growth.
- j. **Mitigation Measure No. 81:** The irrigation system shall utilize plastic polyvinyl chloride piping as its main supply lines. Distribution lines shall consist of ½-inch-diameter polyethylene drip tubing. Water shall be delivered to the plants via conventional drip spot emitters. Vortex emitters rated at 1 to 3 gallons per hour shall be used for the emitters. All irrigation water shall be filtered through a "Y" filter containing a 150 mesh screen. The irrigation systems shall be controlled automatically with remote battery-powered controllers and electrical irrigation valves. Watering frequency and duration shall be adjusted as necessary, depending on soil condition, weather, and plant requirements. To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program shall be implemented. Each year, the mitigation planting shall be monitored for growth and survival.
- k. **Mitigation Measure No. 82:** An annual monitoring report shall be prepared and submitted to the City Department of Public Works, Street Tree Division, by the project proponent. This report shall detail the growth and survival record for each mitigation tree planted. The report will provide an accounting of the number of trees required for mitigation versus the number of qualifying trees planted. Maintenance recommendations will be included in the annual report.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to native and nonnative tree resources identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

- 1. A tree assessment report was prepared to identify the

removal of indigenous oaks and other trees as a result of project development. This report was prepared by registered professional foresters in consultation with the City Forester using the City of Los Angeles Oak Tree Ordinance and oak tree reporting requirements (Ordinance 153,478; Article 6, Chapter IV) as the basis for the field evaluation of all trees that were surveyed.

2. There were 675 trees of qualifying size identified in the survey area. Of that total, 24 tree species were identified. Coast live oak is the dominant tree species and comprises 81 percent of all inventoried trees.
3. Approximately 45 percent of surveyed Coast live oak trees had evidence of fire damage. In addition, 42 percent of canyon live oaks, 8 percent of big-cone Douglas fir, 25 percent of sycamore, 57 percent of black walnut, and 67 percent of big-leaf maple trees also exhibited signs of fire damage.
4. Of the Coast live oak trees surveyed, 38 percent were observed with fire damage in their trunk cavities. Over 52 percent of canyon live oak trees have trunk cavities.
5. The primary disease observed in the survey area was heart rot. Heart rot was observed in Coast live oak trees (36 percent), canyon live oak trees (47 percent), and sycamore trees (75 percent).
6. Native and nonnative tree resources that would be removed as a result of project development include approximately 545 Coast live oaks, 19 canyon live oaks, and 14 Southern California black walnut trees. See also the Responses to Comments in the Final SEIR,

Reference: For a complete discussion of impacts relating to Biological Resources (Native and Nonnative Tree Resources), please see Section 4.4.3 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; Topical Issue 11: Oak Trees and Douglas Fir Trees and Topical Issue 13: Closure of Existing Inactive City Landfill.

5.5 NOISE

Operational Noise Impacts

- 5.5.1 Description of Potential Significant Effect:** Increased noise levels may be audible to nearby sensitive receptors

as a result of additional traffic due to heavy construction equipment, worker commute trips, and delivery trucks associated with project development.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 83:** Landfilling operations shall be limited to the hours from 6:00 a.m. to 6:00 p.m., Monday through Friday, and from 7:00 a.m. to 2:00 p.m. on Saturday. However, the landfill entrance gate shall be open to waste-hauling vehicles at 5:00 a.m., Monday through Friday, and at 7:00 a.m. on Saturday to provide for truck and vehicle queuing. Because of the proximity of the landfill site to residential areas, citizens, small commercial, and private users of the landfill shall be encouraged by the project proponent (e.g., onsite signage, flyers, mailers) to use alternate routes (other than Balboa Boulevard).
- b. **Mitigation Measure No. 84:** All landfill equipment shall be equipped with air flow silencers on intake systems and low-noise mufflers on exhaust systems that shall be properly maintained.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to noise identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The construction sequencing of the proposed project would not significantly impact the existing ambient noise levels at any of the selected noise-reading locations. Noise would also be produced by construction workers and delivery trucks accessing the site. Truck traffic is projected to be approximately eight trucks per day, and construction worker traffic is projected to be 70 vehicles per day. The main point of potential impact would be at the landfill entrance at San Fernando Road because all construction workers would use this access roadway and certain receptors are located directly across the street. It is anticipated that 70 trips would be

added to the existing 1,970 vehicles that already use San Fernando Road during the a.m. peak hour. An additional 70 vehicles would add less than 0.2 dBA (decibels on an A-weighted scale) to the peak hour traffic noise (and far less to the community noise equivalent level [CNEL]). This impact would not be considered audible or present a significant noise impact on sensitive receptors in the immediate area.

2. The intervening ridgelines within Sunshine Canyon and the extended distance between the project site and residential receptors serve as an effective buffer and shield these areas from any potential noise impacts originating from landfilling operations. Noise is further masked by existing noise sources from the freeway and other nonlandfill-related urban noise sources. The nearest residential unit (southwest of the project site) is located approximately 1,700 feet from the southernmost portion of the proposed landfill footprint area. This receptor is effectively shielded from the project area by a ± 100 acre landscaped open space area and an intervening ridgeline.
3. The noise emanating from the existing, inactive landfill (associated with routine maintenance) is not audible to the residential developments located south of the project site unless maintenance equipment is operating near the top deck area of the existing landfill.
4. All proposed operational activity related to the proposed project would take place within the confines of Sunshine Canyon and below existing ridgelines. Therefore, any sound from landfilling operations would be blocked from these areas by the existing landfill, intervening terrain, and landscape berming within the ± 100 acre open space area. Any landfill operation noise that may be audible at the trailers located across from the landfill entrance would be attenuated by the extended distance and masked by existing I-5 Freeway, railroad, and wood chopping operational noise. Therefore, any potential noise impacts associated with landfill operations would be from increased truck traffic located in proximity to noise receptor locations.

Reference: For a complete discussion of impacts relating to Noise (Operational Noise Impacts), please see Section 4.5.2 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical

Issue 14: Noise.

5.6 LIGHT AND GLARE

- 5.6.1 Description of Potential Significant Effect:** Development of the proposed project would result in the addition of new light sources onsite.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 85:** All lighting shall be shielded and directed onto the site. No floodlighting shall be located that can be seen directly by adjacent residents, motorists on adjacent public streets or highways, or pilots within the "airport approach zone." This condition shall not preclude the installation of low-level security lighting.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to additional light sources identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Existing sources of light on the project site are associated with both interior and exterior usage, such as administrative/office structures; the nursery area; security lighting at the landfill entrance, scale house area, certain environmental control systems; and vehicles used for security. Existing light sources do not create or cause a significant impact on motorists or residents because of location and distance from these uses.
2. The proposed project would require the relocation of several onsite building structures, such as the administrative/general office, the scale house area, and the environmental control center. The relocation and/or the development of new environmental control features, such as the flaring stations and leachate treatment plant, will require lighting for security and maintenance purposes. Therefore, several new light sources would be created onsite. Onsite security lighting and security

operations would reintroduce both limited night-lighting (stationary) and other associated lighting (vehicle headlights) during nightly security patrols. Because the landfill would only be operational during daytime and early evening hours, very low levels of onsite nighttime illumination is anticipated to be of very limited duration and confined to specific maintenance areas at the project site.

3. Because the project site is located within an "Airport Approach Zone," the following use restrictions would apply:

No illuminated or flashing advertising or business sign, billboard or any other structure shall be installed or maintained within an airport hazard area which would make it difficult for flyers to distinguish between said lights and the aeronautical lights of the airport, or which would result in glare in the eyes of the pilot and impairment of visibility or otherwise endanger the landing, taking off or maneuvering of aircraft.³⁰

4. Because of the distance of the onsite light sources from adjoining uses and the low intensity of the light sources, both light and glare created on the project site (within both City and County jurisdictions) would not be visible to surrounding areas. Project lighting would not be visible offsite to area residents during nighttime hours because of the intervening topography and existing ±100 acre open space area that separates the project site from near-site receptors. Over 10,000 trees have been planted in this open space area, and most are now over 15 feet tall.

Reference: For a complete discussion of impacts relating to Light and Glare, please see Section 4.6 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

5.7 LAND USE

Community Plan and Zoning Designations

5.7.1 Description of Potential Significant Effect: Potentially

³⁰/City of Los Angeles Municipal Code, Chapter I, Article 2, § 12.5 (Airport Approach Zoning Regulations).

sensitive land uses include six trailers located immediately east of the landfill entrance across San Fernando Road (and ± 700 feet from the proposed landfill footprint). Additionally, the closest residential house (Timber Ridge Drive in Granada Hills) would be located $\pm 1,700$ feet south of the proposed landfill footprint.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 86:** Maintain and enhance the 100 acre \pm open space area in the southern portion of the site by implementing revegetation programs in conjunction with onsite programs.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to sensitive land uses identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts are presented in support of these findings:

1. A general plan amendment/zone change is requested for the project site within the City jurisdiction to permit the uses proposed. The requested general plan amendment is from Open Space to Heavy Industrial. The corresponding zone change request is from A1-1-K-0 (Agricultural, Height District 1, Oil District Overlay) to M3-1-0 (Heavy Industrial, Height District, Oil District Overlay).
2. The proposed City/County Landfill footprint's maximum vertical height at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL. The perimeter ridgeline along the southern boundary of the project site (near the City/County boundary) rises to a maximum elevation of about 2,150 MSL. Elevations in this area would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills.
3. The project site is topographically isolated and lies within a portion of the Santa Susana Mountains. The ± 100 acre open space area located along the southern perimeter of the project site has undergone extensive revegetation

and has been planted with over 10,000 trees. Many of these trees are native and are over 15 feet high. This open space area elevates several hundred feet higher (i.e., ranging in height from 1,425 to 1,975 feet MSL) than existing residential areas located to the south (i.e., approximately 1,300 to 1,400 feet MSL). The existing perimeter ridgeline, open space area, and portions of the existing inactive landfill are located between these uses, thus forming an effective transition between residential use and proposed landfill operations and activities.

Reference: For a complete discussion of impacts relating to Land Use (Community Plan, General Plan, Area Plan, and Zoning Designations), please see Section 4.7.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; Topical Issue 13: closure of Existing Inactive City Landfill and Topical Issue 22: Compatibility with Residential Uses.

5.8 RISK OF UPSET

Hazardous Materials

5.8.1 Description of Potential Significant Effect: The inadvertent acceptance of hazardous waste at the proposed landfill has the potential to result in significant impacts on facility workers (e.g., dermal exposure or inhalation) if hazardous waste identification, training, and handling procedures are not properly implemented. Household hazardous waste (HHW) materials removed from the waste stream and stored onsite have the potential to result in impacts on facility workers if proper handling and storage procedures are not used. The proposed operation of the landfill also has the potential to result in small spills of potentially hazardous liquids used during landfill operations.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 87:** The landfill shall be operated as a Class III landfill; no liquid, acutely hazardous, radioactive material, or infectious medical wastes will be accepted.

- b. **Mitigation Measure No. 88:** Haulers disposing of drums (i.e., 55-gallon) shall have drums triple-rinsed with tops and bottoms removed prior to acceptance.
- c. **Mitigation Measure No. 89:** Notices shall be posted at prominent locations onsite to notify waste haulers about hazardous waste policies of the landfill operator and to inform haulers that hazardous waste cannot be disposed of at the facility. Signage shall help inform waste haulers of the rules and regulations governing the disposal of hazardous waste.
- d. **Mitigation Measure No. 90:** A refuse inspection program that includes direct visual inspection, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles, and radiation detecting devices, shall be implemented by the landfill operator to prohibit the illegal dumping or disposal of liquids and hazardous wastes at the landfill.
- e. **Mitigation Measure No. 91:** The landfill operator shall implement a hazardous waste load-checking program. This program shall include inspecting random loads for hazardous wastes in a segregated area of the landfill, and landfill employees shall scan waste materials as they are being unloaded at the active working face. Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.
- f. **Mitigation Measure No. 92:** If hazardous waste materials are discovered, emergency response shall include worker identification and notification procedures, cordoning off the area, and notifying the Cal-EPA, DTSC. Once hazardous waste is identified, the material shall be removed, containerized, and temporarily stored onsite, if safe to handle. In the unlikely event that acutely hazardous material is discovered, the immediate area will be evacuated, and a qualified hazardous waste hauler shall be contacted for immediate collection and disposal of the material at a permitted Class I hazardous waste landfill. After any such incident, all necessary reports shall be completed and filed by the landfill operator with the following agencies: City of Los Angeles Police

Department, County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, City of Los Angeles Fire Department, City of Los Angeles Department of Environmental Affairs, and the LARWQCB.

- g. **Mitigation Measure No. 93:** Landfill employee training programs on hazardous waste detection shall be conducted. These programs shall be presented during preemployment and for subsequent annual review for all employees.
- h. **Mitigation Measure No. 94:** The spill response program shall be part of required training for all facility employees. In the event of a spill, containment is paramount. All landfill employees shall be trained to use dirt and/or other absorbent materials to pick up and/or contain small spills of oils, solvents, and/or other materials that may be harmful to the public, facility workers, or the environment. Training in the use of personal protective equipment, fire extinguishing aids (e.g., hoses or extinguishers), and spill containment/mitigation (e.g., absorbents) shall be provided.
- i. **Mitigation Measure No. 95:** Full-time inspectors shall be employed onsite for inspection of waste materials. Full-time inspectors shall be deemed by the City to be qualified through training and experience to perform assigned duties.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to hazardous wastes identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

- 1. The proposed project would be designed as a Class III nonhazardous landfill facility and would not be a generator of repository for hazardous wastes. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility.
- 2. The landfill operator would implement a hazardous waste load-checking program at the project site similar to the program that currently exists at the operational County

Landfill. This program would include employees visually inspecting incoming waste-hauling loads at the scale house area and using remote television monitors to inspect incoming rolloff-type loads and open-top vehicles. Radiation-detecting devices, would also be used at the scale house area to prevent the unauthorized disposal of hazardous waste materials.

3. The County Landfill operation currently provides signage at the landfill entrance informing waste haulers that the facility is designated as a Class III nonhazardous landfill site. Signage informs waste haulers of the rules and regulations governing the disposal of hazardous waste.
4. It is expected that small volumes of HHWs would remain undetected and be disposed of at the proposed landfill. These wastes are generally inadvertently mixed in with residential solid wastes by residential customers. However, approximately 46 percent of all refuse entering the project site would be delivered via transfer trucks. These transfer trucks would haul residual (i.e., nonrecyclable) waste materials from transfer stations/material recovery facilities (MRFs). All transfer stations/MRFs have existing load-checking programs in-place. At these facilities, HHW, if found, is manually sorted and picked out of the waste stream and disposed of properly. In some cases, this material can be recycled.
5. The operation of the proposed project would include the use and storage of a limited volume of potentially hazardous liquids including hydrocarbon condensate, motor oil, diesel fuel, cleaning solvents, propane (as a liquid), and ammonia.

Reference: For a complete discussion of impacts relating to Risk of Upset (Hazardous Materials), please see Section 4.9.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 16: Hazardous Materials.

Vectors

- 5.8.2 Description of Potential Significant Effect:** The proposed project has the potential to attract different types of vectors (e.g., rodents, scavenging birds, and insects) to the project site.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 96:** The landfill operator shall monitor the site on a regular basis for vector activity. In addition, the site shall be inspected by the City LEA on a regular schedule. Corrective measures shall be immediately taken should a vector problem be detected.
- b. **Mitigation Measure No. 97:** Vectors (bird activity) shall be effectively eliminated by stringing wire or monofilament line (15 to 20 pound test) above the active landfill working areas at intervals of 100 to 150 feet, or by other approved means. This disrupts the birds' circling patterns to the extent that they do not attempt to land or congregate to feed on the refuse.
- c. **Mitigation Measure No. 98:** Flies shall be controlled at the project site by a trap-and-destroy program. The use of sprays shall be avoided to the fullest extent possible.
- d. **Mitigation Measure No. 99:** Rodent-related problems shall be controlled by operational techniques that are in accordance with recommendations from the City LEA and the Cal-EPA.
- e. **Mitigation Measure No. 100:** Operational techniques shall be utilized to limit vector activity, including compacting waste at the landfill active working face, properly applying cover material; keeping the active working face as small as safely possible given the type and number of landfill equipment, properly grading interim fill surfaces and final fill slopes, and eliminating ponding areas at the project site.
- f. **Mitigation Measure No. 101:** All equipment shall be in good condition and cleaned in a frequency and manner so as to prevent the propagation or attraction of flies, rodents, or other vectors, and the creation of nuisances.
- g. **Mitigation Measure No. 102:** Items used at the landfill facility that could attract vectors (e.g., food, seed, office supplies, etc.) shall be stored in closed containers and/or within an enclosed structure. These containers shall be inspected regularly and be disposed

of if they appear to be an attraction to any vectors.

- h. **Mitigation Measure No. 103:** Salvaged materials generated onsite or imported shall be placed away from storage areas, and other activity areas, and limited to a volume approved by the City LEA, local land use authority, or other approval agencies, minimizing the harborage or attraction of flies, rodents, or other vectors, and the creation of nuisances.
- i. **Mitigation Measure No. 104:** All buildings, paved areas, landscaped areas, and perimeter areas shall be inspected regularly for signs of vectors. Any building openings, ground holes, and deficiencies shall be repaired as they are discovered during routine inspections to prevent the intrusion of any ground vectors.
- j. **Mitigation Measure No. 105:** In the event that vectors may occur onsite, appropriate measures shall be implemented (e.g., the use of a professional exterminator).

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to vectors identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Nonnative species of rodents such as the brown (Norwegian) rat, black (roof) rat, and house mouse are considered to be disease-carrying vectors and can inhabit landfill areas. In addition, common scavenging birds such as pigeons, crows, and sea gulls can be found at landfill facilities. Several species of insects associated with solid waste can be responsible for the spread of disease. Flies are typically associated with landfill areas, and mosquitos can also pose problems, particularly if standing or slow-moving water exists within the site area. Additionally, the German cockroach, oriental cockroach, brown-banded cockroach, American cockroach, long-tailed silverfish, cat flea, house fly, and the Argentine ant are common pests.
2. Certain types of vectors, such as rodents and insects,

can be transported to the site via collection vehicles or self-haul trucks. Generally, the materials contained in curbside collection vehicles are continuously compacted prior to disposal at any facility. The residual solid waste materials from transfer stations/MRFs are also densely compacted into transfer trucks. These trucks are either enclosed or tarped prior to transport. General compaction densities would inhibit vector migration.

3. If a food source is available at the landfill for common scavenging birds such as pigeons, crows, and sea gulls, this could result in food and other wastes being carried to nearby properties, and feathers and excrement being deposited in proximity to the point of origin. Ticks, mites, lice, and fleas associated with the birds could transmit disease to humans.
4. Effective operational and QA/QC procedures would be provided by the project proponent to ensure that the proper coverage of landfilled waste materials would be performed on a daily basis. Similar to the existing County Landfill vector control practices, all waste materials brought to the site would be unloaded at an active working face area, compacted, and covered with at least six inches of clean soil by the end of the working day. Approximately 1,400 pounds of compaction per cubic yard would be obtained by the project proponent, thus achieving greater refuse density per volume measurement and reducing potential vector impacts from providing a food source or habitation.
5. Many items that would be stored and used at the landfill facilities (e.g., administrative and employee ancillary buildings) could have the potential to attract vectors (e.g., food, seed, office supplies), but will stored in closed containers and/or within an enclosed structure. See also the Responses to Comments in the Final SEIR,

Reference: For a complete discussion of impacts relating to Risk of Upset (Vectors), please see Section 4.9.2 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 17: Vector Prevention and Control.

Litter

5.8.3 Description of Potential Significant Effect: Solid waste landfills have the potential to generate litter, which

could result in potential nuisance or aesthetic impacts. Because the project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions within this area could potentially transport litter offsite. The proposed construction and operation of the City/County Landfill have the potential to generate fugitive dust and create offsite migrating litter onto land uses if not properly mitigated.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 106:** The landfill site shall be operated to minimize litter generation through implementation of the following measures: compaction of waste at the working face (i.e., 1,400 pounds of compaction per cu. yd.); waste materials covered with at least 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day; and maintenance of the active working face areas as small as safely possible given the type and quantity of landfill equipment.
- b. **Mitigation Measure No. 107:** Litter and debris shall be contained within the landfill property boundaries by the use of secondary litter fences (located along the outside perimeter of the landfill) and by portable litter fences placed adjacent to the active working face areas.
- c. **Mitigation Measure No. 108:** The landfill operator shall inform owners of registered vehicles, by signage, to comply with vehicle tarping requirements under § 23114 and 23115 of the California Vehicle Code. Those waste haulers who repeatedly violate this code shall not be allowed to dispose of their waste loads at the facility or shall be fined until corrective measures are taken.
- d. **Mitigation Measure No. 109:** On a once a week basis, or as needed, the landfill operator shall mobilize cleanup crews to provide litter pickup services within the O'Melveny Park area, along Balboa Boulevard and San Fernando Road, and in other residential areas located in proximity to the landfill, that may be affected by offsite litter migration. On a daily basis, the cleanup crews shall inspect the surrounding area to assess if more frequent cleanups are required.

- e. **Mitigation Measure No. 110:** Landfill employees shall watch for any illegal dumping activities on or around the project site. The landfill litter control crew shall provide cleanup service for areas surrounding the project site.
- f. **Mitigation Measure No. 111:** The administrative offices shall be equipped with a radio dispatch system that can quickly engage crews to respond to perceived litter complaints in the surrounding neighborhoods.
- g. **Mitigation Measure No. 112:** The onsite City LEA shall inspect the landfill on a regular basis, at which time the effectiveness of the litter control program shall be documented and any necessary improvements shall be made, including
- Landfill personnel shall continuously patrol the access road to the scales from the time the landfill opens until the time of closure in the evening.
 - Improperly covered or contained loads that may result in a significant release of litter shall be immediately detained and the condition corrected, if practical, before the load proceeds to the active working face areas. If correction cannot be made, the load shall be conducted under escort to the working face.
 - All debris found on or along the landfill entrance and working face access roads shall be immediately removed.
 - Operating areas shall be located in wind-shielded portions of the landfill during windy periods.
 - Litter fences shall be installed in operating active working face areas, as deemed necessary by the LEA.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to fugitive dust and litter identified in the Final SEIR to a less than significant level..

Rationale for Findings: The following facts and related

mitigation measures are presented in support of these findings:

1. Sources of litter associated with operation of a landfill facility include waste materials blown from or dropped by refuse-hauling vehicles en route to a landfill or at the landfill site, waste blown or scattered litter dislodged from the active working face by the wind or the movement of landfill equipment, and unauthorized or illegal dumping.
2. The strongest winds generated within the Santa Susana Mountains are during short-term episodes of "Santa Ana" wind conditions. Santa Ana conditions are prevalent in Southern California during the fall through spring and average approximately 5 to 10 episodes a year.
3. The operational County Landfill uses an extensive litter control program with specific preventative and response measures to control windblown litter and debris onsite and, if necessary, within the vicinity of the landfill site. Similar litter control measures would also be implemented for the proposed project.
4. A ± 100 acre open space area is located between the proposed landfill working face areas and the nearest residential unit in Granada Hills. In addition, 25-foot-high secondary litter fences would be located along the southern perimeter of the project boundary to alleviate offsite litter migration.

Reference: For a complete discussion of impacts relating to Risk of Upset (Litter), please see Section 4.9.3 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 18: Litter Control.

Employee Safety and Site Security

- 5.8.4 Description of Potential Significant Effect:** The proposed project has the potential to result in serious workplace accidents due to the movement of heavy equipment and refuse vehicles, exposure of workers to hazardous substances, potential fire hazards, and accidents to workers performing maintenance or repair work on heavy machinery.

Mitigation Measures: Based on the analysis presented in the

Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 113:** The landfill operator shall implement an IIP program in compliance with CCR, Title 8, § 3203, designed to protect employees from work-related hazards associated with operation of the landfill site. Unsafe or unhealthful work conditions, practices, or procedures shall be immediately corrected by the landfill operator.
- b. **Mitigation Measure No. 114:** Each supervisor or manager shall conduct regular periodic inspections to identify less-than-adequate or unsafe working conditions, improper or unsafe work practices, or procedures in their work areas. The maintenance supervisor shall be notified of needed repairs or corrective measures using a "safety inspection report" form. Additional inspections shall be accomplished whenever new processes, procedures, substances, or equipment are introduced into the workplace or when a supervisor becomes aware of a new, potential, or previously unrecognized hazard.
- c. **Mitigation Measure No. 115:** Appropriate inspection checklists shall be developed, used, and maintained to accurately reflect various exposures in different work areas. Daily observation of the workplace environment by employees, supervisors, managers, and the safety director shall occur. Discrepancies shall be reported. Records of inspections, deficiencies, and corrective measures shall be maintained in the safety/maintenance offices.
- d. **Mitigation Measure No. 116:** If a problem or discrepancy is identified, an inspection report shall be prepared. The report shall identify the priority assigned to each discrepancy, as follows: Priority One, resolve the problem immediately; Priority Two, resolve the problem by the end of the working day; Priority Three, resolve the problem within 48 to 72 hours; and Priority Four, resolve the problem within 1 week as soon as the part(s) and/or materials are available. Unsafe work practices shall be interrupted immediately by the observing supervisor. Appropriate training shall be implemented. If the unsafe practice continues, progressive discipline shall be employed.
- e. **Mitigation Measure No. 117:** Communication of safety and health methods to employees shall include verbal

communication with employees at quarterly safety meetings; small group meetings conducted by first-line supervisors with their respective employee groups that shall be weekly "tailgate," "toolbox," or operations and safety meetings; written safety and health issues posted on employee bulletin boards; safety posters; suggestion boxes for employees to anonymously utilize; and action by management to evaluate and implement the pertinent employee safety suggestions.

- f. **Mitigation Measure No. 118:** Accident/injury reports, inspections, and findings, including corrections and training records, shall be kept for 3 years. The OSHA Log 200 shall be retained by the landfill operator for a period of 5 years. Medical records for those employees involved in handling of hazardous wastes shall be maintained for a period of 30 years after employment termination.
- g. **Mitigation Measure No. 119:** First-aid kits shall be located in dispatch, maintenance, scale houses, and corporate administrative offices, in addition to all supervisor vehicles. These kits shall contain "Band-Aids," bandages, sprays, miscellaneous ointments, and minor treatment supplies. These supplies are intended for treatment of small or nonserious cuts, burns, scrapes, etc. Injuries requiring medical attention shall be treated at the Holy Cross Medical Center. This hospital shall also provide ambulance service.
- h. **Mitigation Measure No. 120:** The landfill operator shall implement an emergency action plan in compliance with CCR, Title 8, § 3220. This plan shall designate emergency escape routes and procedures, rescue and medical duties, methods for reporting fires and other emergencies; and names of persons and departments to contact during an emergency.
- i. **Mitigation Measure No. 121:** The landfill operator shall implement a fire prevention plan in compliance with CCR, Title 8, § 3221. Components of this written fire prevention plan shall include potential fire hazards and their proper handling and storage procedures; potential ignition sources (i.e., welding or smoking), their control procedures, and the type of fire protection equipment or systems that can control a fire involving them; names or regular job titles of those responsible for maintenance of equipment and systems installed to

prevent or control ignitions or fires; and names or regular job titles of those responsible for the control of accumulation of flammable or combustible waste materials.

- j. **Mitigation Measure No. 122:** In compliance with CCR, Title 8, § 3314, lockout/blockout procedures shall be implemented at the proposed project. Machinery or equipment capable of movement shall be stopped and the power source deenergized or disengaged; if necessary, the moveable parts shall be mechanically blocked or locked out to prevent inadvertent movement during cleaning, servicing, or adjusting operations. If the machinery or equipment must be capable of movement during this period in order to perform the specific task, the designated station manager or supervisor shall minimize the hazard of movement by providing and requiring the use of extension tools or other methods to protect employees from injury. Prime movers, equipment, or power-driven machines equipped with lockable controls or readily adaptable to lockable controls shall be locked out or positively sealed in the "off" position during repair work and setting-up operations. The operator shall provide a sufficient number of accident prevention signs or tags and padlocks, seals, or other similarly effective means to safely conduct repairs.
- k. **Mitigation Measure No. 123:** Personal protective equipment shall be provided to all operations employees and will include hard hats, heavy gloves, ear plugs, dust masks, safety boots, goggles, and safety vests.
- l. **Mitigation Measure No. 124:** The landfill operator shall comply with all applicable safety ordinances contained in the City of Los Angeles Municipal Code.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to employee safety identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

- 1. Based on existing State law, every California employer must establish, implement, and maintain a written injury

and illness prevention (IIP) program. A copy of that program must be maintained at each workplace or at a central worksite if the employer maintains nonfixed worksites. The requirements for establishing, implementing, and maintaining an IIP program consist of the following eight elements: (1) responsibility, (2) compliance, (3) communication, (4) hazard assessment, (5) accident and exposure investigation, (6) hazard correction, (7) training and instruction, and (8) recordkeeping.

2. The project proponent shall ensure that emergency medical services would be available for all project employees. In addition, the project proponent shall ensure the availability of a suitable number of appropriately trained persons to render first aid and readily available first-aid kits shall be provided.
3. The project proponent shall inform all employees of the procedures to follow in case of injury or illness. Proper equipment for the prompt transportation of the injured or ill person to a physician or hospital where emergency care is provided, or an effective communication system for contacting hospitals or other emergency medical facilities, physicians, ambulance, and fire services, shall be provided.
4. Procedures for investigating workplace accidents and hazardous substance exposures would be implemented by landfill management personnel. These procedures would include the following: (1) visiting the accident scene as soon as possible and interviewing injured workers and witnesses, (2) examining the workplace for factors associated with the accident/exposure, (3) determining the cause of the accident/exposure, (4) taking corrective action to prevent the accident/exposure from reoccurring, and (5) recording the findings and corrective actions taken. Any unsafe or unhealthy work conditions, practices, or procedures are required to be corrected by the landfill site manager or supervisor in a timely manner dependent on the severity of the hazard.
5. Similar to the existing County Landfill operation, employees would also inform refuse haulers (if necessary) at the scale house area of the procedures for unloading solid waste materials. Flaggers shall be used onsite where barricades and warning signs cannot control the moving traffic. Flaggers shall be trained in the proper

fundamentals of flagging moving traffic.

Reference: For a complete discussion of impacts relating to Risk of Upset (Employee Safety and Site Security), please see Section 4.9.4 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

5.8.5 Description of Potential Significant Effect: Potential security problems resulting from unauthorized entry could include unauthorized dumping, scavenging, vandalism, or arson.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 125:** The landfill operator shall maintain perimeter fencing in and around the site in accordance with CCR, Title 14, § 17658 to discourage illegal entry to the landfill. Where existing topography conditions create an effective barrier, no perimeter fencing shall be installed. Entrance and access gates shall remain locked when the landfill facility is not in operation. All existing perimeter fencing shall be inspected on a routine basis by the landfill operator, and necessary repairs shall be made to ensure a continued deterrent for unauthorized entry to the project site. Additionally, the landfill operator shall maintain posted "no trespassing" signage at the exterior perimeter fencing nearest the project site entrance.
- b. **Mitigation Measure No. 126:** All landfill equipment shall be properly maintained and operated to minimize the health and safety impacts on landfill personnel and the public. Standby equipment shall be made available during periods of vehicle maintenance or breakdown.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to site security identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The project site is topographically isolated within the region, especially within the Sunshine Canyon area. Because of the site's physical location and surrounding steep terrain, the project area provides an effective barrier against unauthorized access.
2. The project proponent currently maintains 24-hour security personnel at the landfill entrance to prevent and deter unauthorized entry.
3. The project proponent currently maintains a perimeter 6 foot-high chainlink fence along the eastern portion of the project site next to the landfill entrance to discourage unauthorized entry by persons or vehicles. This fencing is routinely inspected (i.e., monthly) by landfill employees to ensure that it has not been damaged nor contains abnormalities such as loose fence tension or malfunctioning gates or locks, and that the fencing continues to provide a deterrent to unauthorized access to the landfill site. Annual inspections for corrosion and rust are also conducted by landfill employees. In addition, "No Trespassing" signs are posted and positioned along perimeter fencing around the site.
4. An exterior lighting system is provided around all buildings, storage areas, high-traffic, and parking areas at the project site.

Reference: For a complete discussion of impacts relating to Risk of Upset (Employee Safety and Site Security), please see Section 4.9.4 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Human Health

5.8.6 Description of Potential Significant Effect: The proposed project could potentially create a significant human health impact if the proposed landfill operation were to create carcinogenic risks or other related human health impacts on surrounding area residents.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 127:** A citizen's advisory committee shall be established, if deemed necessary by the

City Council or Planning Commission through a project condition, to address area resident health concerns about the existing inactive and proposed City/County Landfill project. The committee's mandate shall include discussions with appropriate technical experts and regulatory agencies responsible for the onsite and offsite monitoring activities at the project site. The advisory committee would be responsible for presenting information and discussions of these regulatory agency members back to area residents through planned informational meetings.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to human health identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A comprehensive air quality and health risk assessment was performed to specifically analyze development of the ultimate County/City Landfill (i.e., a 215-million-ton landfill within both County and City areas) within Sunshine Canyon as part of the Sunshine Canyon Landfill Extension FEIR. That assessment evaluated and analyzed cumulative impacts on air quality and potential health risks derived from operation of a total of eight flare stations. The technical analysis performed measured the existing emission rate of the operational flare station and projected emission rates for all other proposed gas flaring stations. The following contaminants were analyzed as part of this assessment: benzene, carbon tetrachloride, chloroform, perchloroethylene, trichloroethane, and vinyl chloride. The findings of this assessment concluded that cumulative project development (i.e., both County/City landfill projects) of the flare stations in Sunshine Canyon and associated impacts would be well below applicable standards (i.e., attainment pollutants) and SCAQMD criteria levels for significance (i.e., nonattainment pollutants). Results of the risk assessment yielded a 70-year excess cancer risk level of 1.59×10^{-8} , which is far below the SCAQMD-designated acceptable level of 1.0×10^{-6} as outlined in SCAQMD Rules 212 and 1401.

2. Discussions with epidemiological professionals indicated that the proposed project would not create risks to human health if the proposed facility is operated and monitored in accordance with regulatory requirements of various public agencies (i.e., SCAQMD, LARWQCB, City of Los Angeles, etc.).

Reference: For a complete discussion of impacts relating to Risk of Upset (Human Health), please see Section 4.9.5 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; Topical Issue 25: Performance of a Health Risk Assessment and Topical Issue 27: Revised Air Quality Data.

Risk of Explosion: Landfill Gas and Collection System

- 5.8.7 Description of Potential Significant Effect:** Improper operation of the LFG collection and flaring system and/or excavation of an unrecorded, abandoned well could result in an explosion.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 128:** Onsite structures shall be continuously monitored for the presence of unsafe levels of methane gas.
- b. **Mitigation Measure No. 129:** If necessary, the landfill operator shall install electrical (e.g., battery backup) combustible gas detectors in habitable structures. Employees shall be trained in all applicable safety requirements to prevent any upset conditions from occurring.
- c. **Mitigation Measure No. 130:** Risks associated with the gas collection and flaring system shall be mitigated through use of flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety shutdown devices have been designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, shall be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground shaking from an

earthquake, and necessary action shall be taken to correct any potential problems.

Abandoned Well Sites

- d. **Mitigation Measure No. 131:** Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.
- e. **Mitigation Measure No. 132:** A portable explosive gas detection device shall be used to determine whether the obstruction is a wellhead that may be leaking natural gas. If this is the case, all personnel shall be evacuated within a 500-foot radius and a representative from the California Department of Conservation, Division of Oil, Gas and Geothermal Resources shall be notified. Excavation activities shall cease until further instruction from Division of Oil, Gas, and Geothermal Resources is received. If gas is not detected, a backhoe or similar type of equipment shall be brought in to further expose the obstruction. If necessary, proper abandonment procedures will be utilized following Division of Oil, Gas, and Geothermal Resources protocol.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to risk of explosion identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

- 1. Landfill operators are required by law to install an LFG collection and flaring system. The existing inactive landfill, which is in the process of landfill closure and eventual postclosure maintenance, has an existing LFG collection and flaring system installed, which is constantly monitored and maintained by onsite landfill personnel. The LFGs collected within this system are currently flared.

2. Regulations require that onsite structures be constantly monitored to ensure there is no buildup of methane or other LFGs associated with the disposal of solid wastes. Onsite monitoring within habitable structures at the project site has not revealed any unsafe concentrations of methane gas exposure to occupants.
3. During a significant seismic event, the LFG collection and flaring system could malfunction and cause an explosion. The proposed system would be similar to the existing LFG collection and flaring system for the existing inactive landfill. As an example of how that system operated during the Northridge earthquake on January 17, 1994, the system successfully shut down, effectively reducing any potential for a risk-of-upset situation. The existing system sustained no damage and was in operation 2 days after that earthquake. The proposed LFG collection and flaring system would have similar shutoff controls to reduce any potential for LFG-related explosions.
4. The project area is located adjacent to the Cascade Oil Field, and both active and abandoned well sites are located in proximity to the project site. As stated in the Los Angeles Citywide General Plan Framework Draft EIR, unrecorded wells and those improperly abandoned have been noted within the Los Angeles area. While none have been noted during past landfiling operations within Sunshine Canyon, the remote possibility does exist that an abandoned wellhead may be encountered during excavation activities.
5. Abandoned wells typically contain 10 to 25 feet of concrete at the surface and a metal cap. The potential to remove a wellhead is extremely remote due to the amount of concrete used at the surface area and the metal cap enclosure. Because heavy equipment operators are trained to recognize, both by sound and by "feel," when an object is struck, any potential obstructions would be investigated during excavation activities.

Reference: For a complete discussion of impacts relating to Risk of Upset (Risk of Explosion), please see Section 4.9.6 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Trenches and Excavations

5.8.8 Description of Potential Significant Effect: Landfill employees working within trenches and excavations have the potential to be exposed to methane gas from the inactive City Landfill or from naturally occurring hydrogen sulfide gases found in areas of former oil-drilling operations.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 133:** A portable explosive gas detection device shall be used in trenches and excavations to determine the presence of methane gases. If unsafe concentrations of gas exist, all employees would be immediately removed from the area of unsafe gas concentration. The safety monitor would be responsible for ensuring that appropriate worker safety equipment is operable, as well as worker education and instruction correctly implemented, to prevent the potential for methane gas explosions.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to gas exposure identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measure are presented in support of these findings:

1. Workers shall not be permitted to enter trenches or excavations where there is an oxygen deficiency or a combustible mixture of methane gas without taking precautionary measures. A landfill employee shall be designated as the safety monitor who would be trained in the use of gas-detection instruments and safety equipment.

Reference: For a complete discussion of impacts relating to Risk of Upset (Employee Safety), please see Section 4.9.4 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Airport Safety (Bird Strikes)

5.8.9 Description of Potential Significant Effect: The

potential exists for bird/aircraft collisions due to the location of Whiteman Air Park approximately five miles southeast of the project site in Pacoima.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 134:** In accordance with CCR § 17258.10 and 40 CFR Section 258.10, the project proponent will notify Whiteman Air Park and the FAA of the proposed project and projected startup date.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to airport safety identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measure are presented in support of these findings:

1. In accordance with CCR, Title 14 § 17258.10,³¹ landfill facilities must address airport safety within the context of the following regulations:

Owners or operators of new MSWLF³² units, existing MSWLF units, and lateral expansions that are located within 10,000 feet (3,048 meters) of any airport runway end used by turbojet aircraft or within 5,000 feet (1,524 meters) of any airport runway end used by only piston-type aircraft must demonstrate that the units are designed and operated so that the MSWLF unit does not pose a bird hazard to aircraft.

Owners or operators proposing to site new MSWLF units and lateral expansions located within a five-mile radius of any airport runway end used by turbojet or piston-type aircraft must notify the affected airport and the Federal Aviation Administration (FAA).

³¹/Based on Federal Aviation Administration Order 5200.5.

³²/Municipal Solid Waste Landfill Facility.

The owner or operator must place the demonstration made pursuant to paragraph (a) of this section in the operating record and notify the board that it has been placed in the operating record.

2. The Whiteman Air Park supports approximately 300 operations per day. The airport is too small to support any commercial activity, and approximately 99 percent of all operations are piston-type aircraft. No recorded bird strikes at Whiteman Air Park have been attributed to past landfill operations. Because this airport verges on the 5-mile radius as denoted in CCR § 17258.10, the project proponent is obligated to notify the affected airport and appropriate FAA office.

Reference: For a complete discussion of impacts relating to Risk of Upset (Airport Safety - Bird Strikes), please see Section 4.9.7 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

5.9 TRANSPORTATION AND CIRCULATION

Traffic

- 5.9.1 **Description of Potential Significant Effect:** With the addition of project-generated traffic, 1998 level of service (LOS) conditions will deteriorate at two intersections: Roxford Street at Encinitas and the I-5 Freeway (northbound [NB] ramp), and San Fernando Road at the project entrance. Five key intersections will experience "significant" volume-to-capacity increases during the a.m./p.m. peak hours. These intersections include Roxford Street at the I-5 Freeway (southbound offramp), Roxford Street at Encinitas and I-5 Freeway (northbound offramp), San Fernando Road at Balboa Boulevard, San Fernando Road at Sierra Highway, and San Fernando Road at the project's driveway.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 135:** For those intersections where project-related traffic volumes are expected to create poor operating conditions and/or significantly impact the operating conditions of the study area intersections, mitigation is designed to improve and/or

change the existing intersection geometry, thereby increasing existing intersection capacity. Capacity improvements shall include roadway widening, roadway restriping, reconfiguring roadways, or providing additional lanes to various approaches of a key intersection.

- b. **Mitigation Measure No. 136:** Roxford Street at the I-5 Freeway (SB ramp)
Restripe westbound approach on Roxford Street to provide dual left-turn lanes and one through lane.
- c. **Mitigation Measure No. 137:** Roxford Street at the Encinitas/I-5 Freeway (NB ramp)
Restripe northbound approach on Encinitas Avenue to provide left-turn lane, shared through/left-turn lane, and shared through/right-turn lane.
- d. **Mitigation Measure No. 138:** San Fernando Road at Balboa Boulevard
This key intersection features two through lanes in each direction on San Fernando Road and two northbound approach lanes, striped as an exclusive left-turn lane and an option left-right turn lane, provided on Balboa connector. A separate westbound left-turn lane, as well as protected left-turn phasing, is provided. Existing pavement widths and physical constraints (i.e., hillside encroachment) do not allow for any physical improvements, such as providing an exclusive eastbound right-turn lane on San Fernando Road for heavy existing and anticipated right-turn volumes.
- e. **Mitigation Measure No. 139:** Contribute to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC shall be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.
- f. **Mitigation Measure No. 140:** San Fernando Road at Sierra Highway
Restripe northbound approach on San Fernando Road to provide a shared through/right-turn lane and exclusive right-turn lane and restripe the westbound approach of Sierra Highway for a 12-foot wide curb lane.

g. **Mitigation Measure No. 141:** San Fernando Road at Project Driveway

Install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC shall be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.

- h. **Mitigation Measure No. 142:** The required street improvements and signal modifications shall be guaranteed before the issuance of any building permit for this project through the B-permit process of the Bureau of Engineering, Department of Public Works, and the encroachment permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of LADOT, the Bureau of Engineering and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a pre-design meeting to finalize the proposed geometric and traffic signal designs needed for the project.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to traffic identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Regional access to the project site from waste hauling vehicles is provided via the following freeway systems: Antelope Valley (SR-14), Foothill (I-210), Simi Valley-San Fernando Valley (SR-118), Golden State (I-5), and San Diego (I-405) Freeways.
2. The transportation system that may be affected by the proposed project includes both existing local roadways

and freeway systems. The following 13 key intersections were identified by the City of Los Angeles Department of Transportation (LADOT) as the locations that have the potential to be impacted by the proposed project and analyzed in the traffic impact study report: (1) Roxford Street at the I-5 Freeway (southbound [SB] offramp); (2) Roxford Street at the Encinitas Avenue/and the I-5 Freeway (northbound [NB] offramp); (3) Roxford Street at the I-5 Freeway (NB offramp); (4) Roxford Street at San Fernando Road; (5) San Fernando Road at Sepulveda Boulevard; (6) San Fernando Road at Balboa Boulevard; (7) San Fernando Road at the I-5 Freeway (SB offramp); (8) San Fernando Road at Sierra Highway; (9) San Fernando Road at Project Driveway; (10) Foothill Boulevard at Sierra Highway; (11) Yarnell Street at Foothill Boulevard; (12) Yarnell Street at the I-210 (eastbound [EB] offramp); and (13) Yarnell Street at the I-210 (westbound [WB] offramp).

3. San Fernando Road is classified as a major highway. This is a four-lane roadway (two travel lanes in each north/south direction) with a posted speed limit of 45 miles per hour (mph). Near the landfill entrance, San Fernando Road is located west of and generally parallel to the I-5 Freeway. North of the SR-14 Freeway, San Fernando Road continues as the Old Road. The average daily two-way volume on San Fernando Road near the project site is approximately 19,700 vehicles.

Sepulveda Boulevard is classified as a major highway and is located south of the project site between San Fernando Road and Roxford Street. Sepulveda Boulevard generally has a north/south alignment, with one travel lane in each direction and a posted speed limit of 45 mph.

Roxford Street is classified as a major highway and has one travel lane in each direction between Encinitas Avenue and San Fernando Road; however, two through lanes and a left-turn lane are provided on Roxford Street at these two intersections. The posted speed limit on Roxford Street is 35 mph. Access to and from the I-5 Freeway is provided via Roxford Street.

Balboa Boulevard is classified as a major highway and extends south from Foothill Boulevard, crosses over the I-5 Freeway and San Fernando Road, and then continues south into the City. A connector road provides access between Balboa Boulevard and San Fernando Road. Balboa

Boulevard restricts truck traffic in excess of 6,000 pounds south of San Fernando. Balboa Boulevard has two to three lanes in each direction and provides a two-way directional left-turn lane between San Fernando Boulevard and Rinaldi Street. Balboa Boulevard, located less than two miles west of the I-405 Freeway, provides an alternative north/south route that generally parallels the I-405 Freeway.

Foothill Boulevard is classified as a major highway with an east/west alignment and is located south of the I-210 Freeway. This roadway extends underneath the I-210 Freeway and parallels the I-5 Freeway northeast of that freeway. Between Sierra Highway and Yarnell Street, Foothill Boulevard includes one travel lane in each direction.

Yarnell Street is classified as a major highway and is a four-lane roadway located near the I-210 Freeway. EB and WB onramps and offramps are provided to that freeway. South of Foothill Boulevard, Yarnell Street continues as a two-lane roadway.

4. Roxford Street at the I-5 Freeway (SB onramp) operates at an existing LOS "F" during the a.m. peak hour, and San Fernando Road at Balboa Boulevard operates at an existing LOS "E" during the p.m. peak hour. The remaining key intersections all operate at LOS "D" or better.
5. Prior to the addition of cumulative and project traffic, 10 of the 13 key intersections are anticipated to operate at a LOS "D" or better during a.m./p.m. peak hours. However, the following remaining three intersections are expected to operate at LOS "E" or LOS "F" during one or both of the a.m./p.m. peak hours in 1998: Roxford Street at the I-5 Freeway (SB offramp), San Fernando Road at Balboa Boulevard, and San Fernando Road at Sierra Highway.
6. The primary source of truck traffic into and out of the landfill facility would most likely be from transfer trucks or smaller residential collection vehicles. Based on information provided by the project proponent and subsequently verified by LADOT, residual refuse brought from transfer stations will account for approximately 46 percent of the total daily waste intake into the facility. In addition, based on the maximum intake rate of 5,500 tpd, approximately 2,550 tpd of refuse (or 46

percent of the maximum daily intake) would originate from transfer stations/MRFs. It is anticipated that approximately 660 transfer trucks (daily/two-way) would be used to transport the waste from these facilities to the proposed site. Transfer trucks are typically 60 feet long and can accommodate a waste capacity of approximately 23.5 tons.

7. Curbside collection vehicles would transport approximately 2,850 tpd (or 52 percent of the maximum daily intake) of the total daily waste intake. Typical curbside collection trucks are 40 feet long and accommodate a capacity of nine tons.
8. The remaining source of transport would originate from local deliveries (e.g., landscapers, gardeners). Approximately 100 tpd (or two percent of the maximum daily intake) of the daily waste intake would be transported by these types of vehicles. It is also anticipated that, on average, approximately 125 half-ton and three-quarter-ton trucks (or self-haul trucks) would transport refuse to the project site.
9. During the a.m. peak hour, 55 percent of the project-specific traffic is expected to be inbound and 45 percent outbound; during the p.m. peak hour, the split between inbound and outbound is reversed (i.e., 45 percent inbound, 55 percent outbound). Based on these factors and assuming the maximum daily intake tonnage (5,500), the proposed project (within the City jurisdiction) is forecasted to generate 129 truck trips (i.e., 75 inbound, 54 outbound) during the a.m. peak hour and 150 truck trips (i.e., 63 inbound, 87 outbound) during the p.m. peak hour.
10. The majority of the employee-related traffic into and out of the project site is expected to occur before or after the typical a.m. and p.m. peak commuter periods. Approximately 10 inbound trips would occur in the morning and 10 outbound in the evening. On a daily basis, the proposed project is forecasted to generate a total of 70 employee trips.
11. The project is forecasted to generate passenger car equivalents (PCEs) of 2,260 trip ends (TEs), with 245 PCE trips generated during the a.m. peak hour and 285 PCE trips generated during the p.m. peak hour.

12. The 33 related projects identified in Section 3.2 of the Draft SEIR are expected to generate a total of 68,320 daily trips (converted to PCEs). Of these trips, an estimated 5,390 total trips (3,365 inbound, 2,025 outbound) are forecasted to occur during the a.m. peak hour, and 7,570 total trips (3,115 inbound, 4,455 outbound) during the p.m. peak hour.
13. With the addition of cumulative traffic, significant impacts on traffic conditions will occur at the following three key intersections: Roxford Street at the I-5 Freeway (SB off ramp), San Fernando Road at Balboa Boulevard, and San Fernando Road at Sierra Highway.
14. As part of the key intersection capacity analysis, a queuing evaluation was performed on the following four key intersections that intersect with the I-5 Freeway: (1) Roxford Street at I-5 Freeway (SB offramps), (2) Roxford Street at Encinitas Avenue and the I-5 Freeway (NB offramp), (3) Roxford Street at the I-5 Freeway (NB offramp), and (4) San Fernando Road at the I-5 Freeway (SB offramp). The results of the queuing analysis indicate that existing ramp storage is sufficient to accommodate forecasted Year 1998 traffic volumes. Each ramp location currently provides over 1,000 feet of queuing capacity. Roxford Street at I-5 Freeway (NB offramp) would be used regularly by project-generated traffic. It is anticipated that 971 and 1,152 vehicles would use this offramp during the a.m. and p.m. peak hours, respectively. A maximum queue length for 14 vehicles per lane can be provided. This equates into a total queue length of approximately 700 feet. Approximately 1,000 feet of storage is provided at this ramp location.
15. Potential traffic impacts at three Congestion Management Program (CMP) freeway monitoring stations along the Golden State Freeway (I-5) and one monitoring station located along the San Diego Freeway (I-405) were reviewed by the traffic consultant. Because a.m./p.m. peak-hour project-generated trips are below the threshold of 150 or more trips required for the freeway segment analysis, no additional analysis was performed. As previously presented in the traffic impact study the proposed project will add a maximum of 73 trips in either direction along the I-5 Freeway during the a.m./p.m. peak hours.

Reference: For a complete discussion of impacts relating to Transportation and Circulation (Traffic), please see Section 4.13.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 20: Planned Haul Routes.

Parking and Safety Concerns

5.9.2 Description of Potential Significant Effect: The proposed project would generate additional truck traffic along San Fernando Road, resulting in potential circulation safety problems at the landfill entrance.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 143:** Prior to issuance of any certificate of occupancy for the project, install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to circulation safety identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. As part of the traffic study conducted for the Sunshine Canyon Landfill Extension FEIR, a safety analysis was performed to determine the potential circulation safety problems associated with truck traffic accessing the landfill entrance via San Fernando Road. In addition to a record search consisting of a computerized retrieval of traffic accident records (from 1982 through 1987), field

observations were made at the landfill entrance to determine the topography and geometrics of that intersection.

2. The record search performed included information for the following intersections: 1-5 Freeway and San Fernando Road, San Fernando Road and Sepulveda Boulevard, Roxford Street and San Fernando Road, and Balboa Boulevard and San Fernando Road. The findings of this search indicated that no unusual safety problems existed at or near the landfill entrance or at these key intersections. At that time, field observations by the traffic consultant disclosed that due to the topography, narrow roadway, and adverse curvilinear alignment of San Fernando Road, the impression is perceived as a less-than-desirable section of roadway. However, the accident record statistics developed by LADOT at this time did not support this impression.
3. Since September 1991, the existing landfill within the City ceased operation and the County Landfill began operation in August 1996. Landfill entrance and roadway improvements for the County Landfill Project were made during summer 1996, and improvements to San Fernando Road were implemented by the City since 1991. Improvements along San Fernando Road have included new surface paving, restriping, curb and gutter replacement, and roadway realignment.
4. In addition, since the opening of the County Landfill, no recorded accidents relating to landfill traffic (i.e., fatal or nonfatal), either along San Fernando Road (in the vicinity of the landfill) or at these four key intersections, have occurred.
5. Field observations of all key intersections were performed as part of the traffic impact analysis for the proposed project. These observations revealed that existing pavement conditions and signs of pavement deterioration were not evident. Visual observations indicate that potential vehicle safety hazards, such as pavement cracking, potholes in the roadways, and signs of roadway sags or humps, are not apparent. Because these observations indicate that overall conditions at these intersections are good, potential accident risks and safety hazards due to physical conditions are not expected to occur.

Reference: For a complete discussion of impacts relating to Right-of-Way and Access/Transportation and Circulation (Parking and Safety Concerns/Access Roadway), please see Sections 4.13.4 and 4.13.5 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 19: Traffic Conditions at Landfill Entrance.

Bicycle Routes

5.9.3 Description of Potential Significant Effect: The proposed project would generate additional truck traffic along San Fernando Road potentially increasing bicycle/truck incidents.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 144:** The following mitigation measure is proposed by the project proponent to address any potential localized impact along the San Fernando Road bicycle lane from increased truck traffic at or near the project site. Signs acceptable to the City shall be posted at or near the entrance to the landfill facility. These signs shall caution the public that heavy truck traffic exists in the area.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to bicycle routes identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The LADOT bikeways map reveals that there are no existing bike paths, lanes, or routes near the project site or along San Fernando Road, Balboa Boulevard, or Foothill Boulevard.
2. The Bicycle Plan, a part of the Transportation Element of the City's General Plan, depicts a Class II bicycle lane designation along San Fernando Road, Sesnon Boulevard, Balboa Boulevard, and Roxford Street.

3. A narrow shoulder area along San Fernando Road exists; however, this lane has not been developed to a Class II bicycle lane standard.
4. During previous operation of the City Landfill and during the current operation of the County Landfill, no significant accidents have occurred between landfill vehicles and bicyclists.

Reference: For a complete discussion of impacts relating to Right-of-Way and Access/Transportation and Circulation (Parking and Safety Concerns/Access Roadway), please see Sections 4.13.4 and 4.13.5 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 19: Traffic Conditions at Landfill Entrance.

5.10 PUBLIC SERVICES

Fire and Emergency Medical Services

- 5.10.1 Description of Potential Significant Effect:** Development of the proposed project would introduce additional workers and structures within a high-fire hazard area, thereby potentially placing greater demands on existing fire protection and paramedic resources.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 145:** Onsite water trucks shall provide sufficient water storage and pumping capabilities to extinguish fires. Tracked dozers and scrapers shall be utilized to smother any onsite fires. Easily accessible soil stockpile areas for daily cover shall be used by landfill personnel to smother onsite fires.
- b. **Mitigation Measure No. 146:** Definitive plans and specifications shall be submitted to the LAFD and requirements for necessary permits satisfied prior to commencement of landfill development.
- c. **Mitigation Measure No. 147:** The project proponent shall maintain and expand existing onsite fire response capabilities by using heavy operating equipment and readily available fire-extinguishing equipment. A 200-

foot long, 1½-inch-diameter fire hose shall be available on water trucks for firefighting at the landfill working face area. If necessary, earthmoving equipment shall be used to control fires by smothering fires with dirt.

- d. **Mitigation Measure No. 148:** Hydrants shall be installed in conformance with LAFD requirements and Los Angeles City Fire Code § 57.09.06.
- e. **Mitigation Measure No. 149:** New construction and placement of water tanks, water mains, and fire hydrants shall be completed prior to landfilling operations and shall meet final fire flow requirements determined by the LAFD.
- f. **Mitigation Measure No. 150:** The project proponent shall maintain brush clearance within 100 feet of landfill operations and structures as specified in Los Angeles City Fire Code § 57.21.07 and 57.25.01. Fire-resistant native plants shall be maintained free of combustible litter (i.e., partly decayed/organic matter). These plants shall be used without restriction within this brush clearance zone.
- g. **Mitigation Measure No. 151:** Fire breaks, roads, and fire trails shall be maintained by the project proponent in accordance with the Los Angeles City Fire Code § 57.09.04 and 57.25.03.
- h. **Mitigation Measure No. 152:** No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- i. **Mitigation Measure No. 153:** Any person owning or having control of any facility, structure, or group of structures on the premises shall provide and maintain LAFD access.
- j. **Mitigation Measure No. 154:** Access for LAFD apparatus and personnel to and into all structures shall be required.
- k. **Mitigation Measure No. 155:** Construction of the realigned access roadway shall not exceed 15 percent in grade. An access road shall be constructed and maintained around the working area of the landfill for

emergency access for fire fighting equipment.

- l. **Mitigation Measure No. 156:** The project proponent shall temporarily close the landfill if a fire of regional significance is located near the project area and poses an imminent threat to the safety of landfill employees.
- m. **Mitigation Measure No. 157:** A detailed fire response plan shall be prepared by the project proponent that incorporates LAFD requirements.
- n. **Mitigation Measure No. 158:** Fire extinguishers shall be maintained in all heavy equipment, onsite work vehicles, and all structures as required by the LAFD.
- o. **Mitigation Measure No. 159:** Signs shall be posted onsite and in a manner approved by the City Fire Chief prohibiting open burning within the project area, as specified under City of Los Angeles Fire Code § 57.25.02.
- p. **Mitigation Measure No. 160:** All internal combustion engines used in landfiling operations shall be equipped with spark arresters.
- q. **Mitigation Measure No. 161:** Landfill equipment shall be cleaned regularly to reduce the potential for equipment fires.
- r. **Mitigation Measure No. 162:** Vehicle and mechanical inspections shall be performed on a regular basis, and focus on the electrical system, hydraulics, and fuel lines.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to fire protection and emergency services identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The LAFD provides fire protection and emergency services for the City, including fire suppression, emergency medical services, hazardous materials control, public assistance, fire prevention, arson and bomb scene

investigation, and the office of emergency services. The LAFD is responsible for building and business inspections, plan review, and construction inspections. Fire protection and paramedic services are provided to the project site (City portion) by the LAFD.

2. Fire Station No. 18 is located at 12050 Balboa Boulevard, approximately 2½ miles from the project site. This is the jurisdictional engine company for the project area and has an anticipated response time of under 10 minutes. Personnel includes one district emergency medical services captain, one captain, one engineer, and two firefighters.
3. Fire protection and paramedic service serving the County is provided by the Los Angeles County Fire Department (LACFD). Station 124 is the jurisdictional engine company located at 25111 Pico Canyon Road, Valencia. Its staffing and equipment levels include a paramedic rescue squad (two firefighters/paramedics) and an engine company (one captain, one engineer, and one firefighter). This station is approximately 6 miles from the site and has an estimated response time of 4 to 5 minutes.
4. The LAFD requires that the project proponent illustrate on a plot plan existing streets and roadways that provide access to the project site. Information includes road widths, centerline radii, grades, road improvements, distance to nearest fire hydrants, the precise locations of onsite hydrants and turnouts, the location of and distance to the nearest fire station and equipment available, and the identification of the water purveyor.
5. The portion of the project site located within the City is designated as a Mountain Fire District. Extremely hazardous brush fires have the potential to occur within this District. The high degree of fire hazard is due to the highly flammable native vegetation, steep terrain, and dry and windy climate conditions (i.e., Santa Ana winds). Development requirements within this District include hillside brush clearance, fire access roads, and fire-resistant construction and landscaping materials.
6. The project site is primarily disturbed from landfilling activities that have occurred over a 30-year period. However, much of the surrounding property is undeveloped and has the potential to create an extreme fire hazard condition. The inactive landfill, access road, and

operational County Landfill serve as a partial firebreak from surrounding brush areas.

7. Small onsite brush fires would be controlled by using landfill equipment such as tracked dozers, scrapers, and water trucks. Control of offsite brush fires would be the responsibility of either the LAFD or LACFD. However, landfill equipment would be made available to these departments during offsite brush fires. If necessary, the inactive landfill top plateau could be used as a staging area for either LAFD or LACFD helicopters making water drops to combat offsite brush fires. In the event that a brush fire encroaches onto the project site, landfill operations would immediately cease until either the LAFD or LACFD is notified. However, tracked dozers would be mobilized immediately by landfill personnel to create firebreaks.
8. Existing onsite water distribution and storage facilities include a 100,000-gallon water tank within the City portion and 265,000-gallon water tank and three fire hydrants within the County portion to meet fire flow demands. Existing water lines distribute water throughout the project site.
9. A Fire Response Plan has been prepared for landfill personnel. This plan details procedures to follow in the event of a fire or explosion, designates an emergency coordinator, and establishes safe havens for employees. All landfill personnel are trained where the nearest fire extinguishers are located, how to extinguish small fires, and who to contact in case of an emergency.
10. For trauma care, the closest hospital facility to the project site is Holy Cross Medical Center. This center is located at 15031 Rinaldi Street within the community of Mission Hills, approximately 5½ miles from the project site. Response time by ambulance to the site is approximately 10 to 12 minutes.
11. Emergency care is also provided via helicopter ("air ambulance") transport. An air ambulance is stationed at the Van Nuys Airport. Total transportation time for an air ambulance to arrive at the project site and transport a victim to Holy Cross Medical Center is 15 to 17 minutes. Helicopters are also used by the LAFD and LACFD fire departments for making water drops during fire fighting operations on brush and grass fires, fire

prevention, prefire planning, and high-hazard fire patrol.

12. Due to the lack of permanent structures, fire flow requirements have been set by the LAFD at 2,000 gallons per minute (gpm) from three fire hydrants flowing simultaneously with a minimum water pressure of 20 pounds per square inch (psi).
13. Based on a required fire flow of 2,000 gpm, the first-due engine company should be within 1½ miles, and the first fire truck company should be within two miles of a project. Since the first-due engine company is 2½ miles and the first-due truck company is approximately 4.3 miles from the project site, existing fire protection would be considered inadequate based on these criteria.

Reference: For a complete discussion of impacts relating to Public Services (Fire and Emergency Services), please see Section 4.14.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 21: Fire Prevention and Control.

5.10.2 Description of Potential Significant Effect: The proposed project has the potential to result in landfill subsurface fires and the acceptance of hot loads has the potential to create a significant fire hazard.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 163:** The project proponent shall provide fire control in compliance with CCR, Title 14, Division 7, Chapter 3, Article 7.6, § 17741 (Burning Wastes). If burning waste is received at the landfill site, it shall be deposited in a safe, isolated area of the landfill and extinguished. If burning waste has been deposited at the working face area, it shall immediately be excavated, spread, and extinguished.
- b. **Mitigation Measure No. 164:** In the event the project proponent detects settlement or venting of smoke, the City LEA shall be contacted. The project proponent under the direction of the City LEA shall undertake appropriate measures to identify the location of the subsurface fire and implement the appropriate fire control techniques to assure the fire has been extinguished.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to fire hazards identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A hot load is defined as a truck that may bring ignited refuse onto a landfill site. If a hot load is brought to the project site, landfill personnel would direct the load to an isolated area of the site where it would be properly extinguished with either tracked dozers, scrapers, or other fire-suppression measures, including water, dry chemical extinguishers, or smothering.
2. Subsurface fires are triggered by the burial of a hot load igniting other refuse materials, the improper operation of the LFG collection and flaring system, or the inadvertent burial of chemical waste. Generally, subsurface fires are dependent on waste composition, moisture content, available oxygen, ambient soil-air pressure, and the insulating characteristics of the surrounding fill-and-cover material. Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire or the venting of smoke or combustion of byproducts through the landfill cover material. This type of fire is minimized by landfill design features, in-place control features used during the operation of the LFG collection and flaring system, and the proper application of cover material. In addition, Landfill personnel would receive training in the recognition of subsurface fires and procedures to be taken in order to respond to such an emergency.

Reference: For a complete discussion of impacts relating to Public Services (Fire and Emergency Services), please see Section 4.14.1 of the Draft SEIR; Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 21: Fire Prevention and Control.

Schools

- 5.10.3 Description of Potential Significant Effect:** Project development would result in additional jobs that may generate the formation of additional households and

students within the Los Angeles Unified School District's (LAUSD) attendance boundaries.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measure has been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 165:** Prior to the issuance of an occupancy permit, the project proponent shall submit proof to the City's Department of Building and Safety that all applicable school impact fees have been paid.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to schools identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Within the Granada Hills-Knollwood CPA, eight elementary, three middle, and two high schools are operated by the LAUSD. The nearest school to the project site is Van Gogh Elementary (approximately 1¼ miles from the landfill entrance or 0.7 mile from the nearest project boundary). This school site is currently closed due to seismic retrofitting and reconstruction. Other schools near the project site include El Oro Way Elementary, Frost Middle School, and Kennedy High School. All schools have available student capacity.
2. Approximately eight new students (based on a generation rate of 0.498 household per worker and 0.45 student per household for grades K-12 referenced in the *Los Angeles Unified School District School Facilities Fee Plan*) would be generated by the proposed project. These additional students could be readily accommodated at nearby schools.
3. LAUSD imposes school development impact fees at the maximum levels allowable under State law (California Government Code, § 65995[b]) for the purpose of constructing new classroom facilities. These fees are collected prior to the issuance of a building permit and are based on the applicable floor area of building square footage multiplied by the current fee assessment.

Currently, \$.30/square foot for new commercial/industrial building space is assessed by LAUSD.

4. Development of the proposed project would require the relocation of ancillary structures (administration building, caretaker trailer, control center, lunchroom/locker room, and scale house) from the County onto lands within the City. These structures, which are all portable trailers (except for the control center), would serve the combined County/City Landfill. As part of permit requirements for the County Landfill, the LAUSD assessed impact fees, that were paid in full by the project proponent.

Reference: For a complete discussion of impacts relating to Public Services (Schools), please see Section 4.14.3 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

- 5.10.5 Description of Potential Significant Effect:** The proposed construction and operation of the City/County Landfill have the potential to generate fugitive dust and create offsite migrating litter onto land uses if not properly mitigated.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the feasible mitigation measures for offsite dust migration (identified under Air Quality, Section 6.1 herein) and offsite litter migration and frequent cleanups of O'Melveny Park (identified under Litter, Section 5.8.3 herein) will be incorporated into the project.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to fugitive dust and litter identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts are presented in support of these findings:

1. The nearest park facility to the project site that is a potential receptor of fugitive dust and litter is O'Melveny Park. No significant dust or litter impacts on O'Melveny Park are anticipated after the implementation of mitigation measures for offsite dust migration (discussed under Air Quality, Section 6.1 herein) and offsite litter migration and frequent cleanups of

O'Melveny Park (discussed under Litter, Section 5.8.3 herein). The proposed project would not create any impacts on the vast majority of park users at O'Melveny Park, including those who would use the large grassy fields for recreational activities (e.g., football, frisbee, paddle ball), individuals using facility barbeque and picnic bench areas, or individuals who are jogging or walking. All of these uses are located at the lower elevations of the park.

Reference: For a complete discussion of impacts relating to Public Services (Parks and Recreational Resources), please see Section 4.14.4 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

5.11 UTILITIES

Electricity

5.11.1 Description of Potential Significant Effect: The proposed project would result in increased electrical consumption of approximately 500 kilowatt hours (kWh) per day due to the installation of new mechanical equipment and environmental control systems.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 166:** The project proponent shall incorporate measures that will exceed minimum efficiency standards for Title 24 of the CCR.
- b. **Mitigation Measure No. 167:** Built-in appliances, refrigerators, and air conditioning equipment shall exceed the minimum efficiency standards for Title 24 of the CCR.
- c. **Mitigation Measure No. 168:** Buildings shall be well sealed to prevent outside air from infiltrating and increasing interior air conditioning and space heating loads. A performance check of the installed air conditioning and space heating systems shall be completed by the project proponent prior to the issuance of the certificate of occupancy to ensure the system properly operates.

- d. **Mitigation Measure No. 169:** Thermal insulation that exceeds requirements established by the CCR shall be installed in walls and ceilings.
- e. **Mitigation Measure No. 170:** Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
- f. **Mitigation Measure No. 171:** Heat-reflective draperies shall be installed on appropriate exposures.
- g. **Mitigation Measure No. 172:** Fluorescent and high-intensity-discharge lamps, which give the highest light output per watt of electricity consumed, shall be installed wherever possible, including all parking lot and site lighting to reduce electricity consumption.
- h. **Mitigation Measure No. 173:** Occupant-controlled light switches and thermostats shall be installed to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
- i. **Mitigation Measure No. 174:** Time-controlled interior and exterior public area lighting limited to that necessary for safety and security shall be installed.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to electrical consumption identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

- 1. Electrical service is provided to the City portion of the project site by the Los Angeles Department of Water and Power (DWP). Power for the existing electrical uses is supplied from DWP's 4.8-kilovolt (kV) distribution lines located adjacent to the site along San Fernando Road. Power for the 4.8-kV distribution system in the project area is supplied from Balboa Distribution Station 86 located at 12960 Balboa Boulevard, less than 1 mile south of the site. The major distribution lines in the site area are fed via the 34.5-kV distribution lines along San

Fernando Road, immediately east of Balboa Boulevard.

2. Electricity is provided to the County portion of the project site by Southern California Edison (SCE) from an overhead 16-kV distribution line located within Weldon Canyon that connects to two existing pole lines located onsite. Power to this line is supplied from the Newhall substation located at the northwest corner of Lyons Avenue and Wiley Canyon Road. Two SCE aboveground electrical transmission lines traverse the project site. The first is identified as the Chatsworth-MacNeil-Newhall-San Fernando 66-kV (50-foot-wide) Transmission Line. This line traverses the project site along the City/County boundary line. Six transmission towers are located on the project site that are part of this distribution system. The second transmission line (two circuits) is identified as the MacNeil-Newhall-San Fernando 66-kV and the Chatsworth-MacNeil-Newhall-San Fernando 66kV (60-foot-wide) Transmission Line. This line runs along the easterly side of the project site boundary, parallel to the I-5 Freeway. Electrical Tower No. M15-T4 of the Chatsworth-MacNeil-Newhall-San Fernando Transmission Line is located in a slope area that has unstable soil conditions.
3. Electricity is consumed onsite to provide power for environmental protection and control systems (i.e., LFG collection and extraction system and flare station, etc.), water pumps, site security and building lighting, heating, and air conditioning. Current electrical consumption at the existing inactive landfill is estimated at 100 kWh per day. Current electrical consumption at the operational County Landfill is estimated at 200 kWh per day. Electrical consumption occurs at similar ancillary uses at the existing County Landfill with the addition of the scale house, leachate treatment system, environmental monitoring facility, administrative building, and employee building. With the availability of local and regional electrical supply and distribution facilities and implementation of the mitigation measures, no significant adverse impacts on electrical service would occur.
4. Development of the proposed City/County Landfill would eventually require the removal and relocation of the underground electrical power line located underneath the landfill access road. Relocation of the underground power line would occur in conjunction with project

sequencing to accommodate the development of new landfilling areas onsite.

5. Development of the proposed project would require reconstruction of six Chatsworth-MacNeil-Newhall-San Fernando Transmission Line towers located on the project site. The project proponent has filed an application with the SCE and has provided funds necessary for completion of an SCE engineering study to delineate a specific design for the removal of the two six towers, the reconstruction of four tabular steel poles, and the removal of Tower No. M15-T4.

Reference: For a complete discussion of impacts relating to Utilities (Electricity), please see Section 4.16.1 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Water

- 5.11.2 Description of Potential Significant Effect:** The proposed project would result in increased water consumption of approximately 221.4 acre-feet of water per year. This equates into an approximate monthly usage of 18.45 acre-feet (or 6,027,600 gallons) or 200,920 gallons per day.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 175:** The project proponent shall coordinate with DWP in advance to efficiently obtain potable water for delivery to the construction site and to meet any restrictions imposed.
- b. **Mitigation Measure No. 176:** When reclaimed water lines are extended into the project area, and if economically feasible, reclaimed water would be utilized onsite for irrigation and dust suppression. Prior to the submittal of design plans to the City's Building and Safety Department, the project proponent shall investigate the possibility of utilizing reclaimed water at the project site.
- c. **Mitigation Measure No. 177:** During the site life of the landfill and ancillary facilities, the landfill operator

shall effectively utilize water-conservation measures at the project site. These measures shall include the following:

- The project proponent shall install an efficient drip irrigation system that minimizes runoff and evaporation, and provides water distribution in an efficient manner.
- A dust suppression additive shall be utilized onsite to minimize water usage.
- Green waste/wood waste (after grinding) will be used onsite as mulch material for revegetation purposes. Mulch shall be applied on the top layers of revegetation areas to improve the water-holding capacity of the soil.
- Onsite revegetation shall include the use of water-conserving plant materials to the greatest extent possible.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to water service identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Potable water is supplied to the project site by the City DWP via an existing 16-inch-diameter water distribution line located underneath San Fernando Road. Existing capacity is sufficient to meet current site usage and consumption demands.
2. Water supplied from DWP is metered as it enters the landfill site near the main entrance located adjacent to San Fernando Road. Water is then conveyed through feeder lines within the canyon and pumped directly into an existing 100,000-gallon water storage tank located near the western perimeter ridgeline of the project site area. The existing water distribution system within the project site is owned, operated, and maintained by the project proponent. The entire system (within the City portion of Sunshine Canyon) includes one 100,000-gallon storage

tank, several water pumps, distribution piping, overhead truck filling stations, and fire hydrants. A similar system is used for County Landfill operations, except that the water storage tank has a capacity of 265,000 gallons. That water tank is located next to the existing County Landfill administrative offices.

3. Onsite water usage is primarily used for dust control and landscape irrigation. A small amount of potable water is used for employee drinking and sanitation needs. Current onsite consumption is approximately 50,000 gallons per month. To reduce the need for onsite water usage, the project proponent uses biodegradable soil stabilizers to control dust, silt, and erosion, and has planted drought-tolerant vegetation. Between November 1987 and October 1988, when the existing inactive landfill was in full operation, approximately 110.7 acre-feet of water was consumed. That usage equates into an approximate use of 9.225 acre-feet per month (or 3,013,800 gallons per month or 100,460 gallons per day).
4. The DWP receives its water supply from local wells, the Los Angeles Aqueduct, Metropolitan Water District (MWD), and recycled water used for nonpotable applications. Based on demand projections contained in the Urban Water Management Plan, there is adequate water supply to meet normal City needs and/or demand for the next 20 years.
5. Currently, no reclaimed water lines service the San Fernando Valley. The Donald C. Tillman Water Reclamation Plant is a potential source of future reclaimed water in the San Fernando Valley. The City is currently proposing to install a reclaimed water line as a joint venture project between several City departments. This line would commence at the Tillman Plant and terminate near Hansen Dam in the City. This project is scheduled to start operating during 1999. The purpose of constructing this reclaimed water line is for groundwater recharge of the San Fernando Water Basin.
6. To implement the proposed project, the 265,000-gallon water storage tank would be relocated to the northeast portion of the project site and connected to a piping distribution system and the DWP water line located underneath San Fernando Road. Two 50-horsepower water booster pumps would be installed near the landfill entrance to provide pumping capabilities so that water could flow upward to the relocated water tank. All water

distribution facilities and equipment within Sunshine Canyon would be owned and maintained by the project proponent. In addition, and if necessary, another 265,000-gallon water storage tank would be used. The existing 100,000-gallon water tank (in the City portion of Sunshine Canyon) would continue to be used for irrigation and dust suppression activities.

7. In addition, development of the proposed project would eventually require the removal and relocation of the underground water line located underneath the landfill access road. Relocation of the water line would occur in conjunction with project sequencing to accommodate the development of new landfilling areas onsite.

Reference: For a complete discussion of impacts relating to Utilities (Water), please see Section 4.16.4 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

5.12 AESTHETICS/VIEWS

- 5.12.1 Description of Potential Significant Effect:** Project development would alter the onsite topographic and natural features of the site, changing the visual character and aesthetic quality of the project site. When landfilling operations are located in the southern portion of Sunshine Canyon, motorists traveling northbound on the I-5 Freeway would have a view of these operations. Landfill operations in the canyon would be visible from the southeast, within areas of Sylmar; and from the westbound lanes of the I-210 Freeway. The proposed project would also be visible from portions of the upper elevations of the O'Melveny Park hiking/equestrian trail.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 178:** The maximum permitted elevations for the landfill shall not be allowed to be exceeded at any time during landfill development and shall be verified through survey control points.
- b. **Mitigation Measure No. 179:** The cover-material excavation areas shall be confined as much as possible to areas that will later be landfilled.

- c. **Mitigation Measure No. 180:** As part of revegetation efforts for the landfill, the upper ridges of the canyon shall be planted with native species (both trees and scrubs) to supplement existing vegetation on the ridgelines and reestablish naturally bare areas.
- d. **Mitigation Measure No. 181:** The final cover of landfilled areas shall be landscaped with a ground cover mix and plant species that are compatible with the immediate area and shall be maintained in a natural setting until it is converted to its final use.
- e. **Mitigation Measure No. 182:** The 100± acre open space area on the southern boundary of the project site shall continue to be maintained and enhanced with both native and nonnative vegetation.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to aesthetics/views identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The project site is bordered to the north by undeveloped mountainous terrain in the County, a gun club, worm farm, and horse stables; to the west and southwest by oil fields; to the south by Bee Canyon, O'Melveny Park, and single-family residential uses; and to the east, along San Fernando Road, by a wood chipping and fire wood area, heavy-duty equipment storage, and six trailers. In addition, the Los Angeles Aqueduct Filtration Plant and MWD's Joseph E. Jensen Filtration Plant boundaries are located approximately ½ mile south of the landfill entrance. The project site is also located near three freeway corridors: the I-5 Freeway directly east of the landfill entrance, the SR-14 Freeway to the northeast, and the I-210 Freeway to the southeast.
2. The most prominent visual features of the project site include several intervening ridgelines that form the southern, northern, and western perimeter boundaries of Sunshine Canyon. The ridgeline along the western boundary of the project site rises to an elevation of about 2,150 feet above MSL. The ridgeline that forms the

northern boundary of the site has an elevation of about 1,825 feet MSL. The canyon floor descends from a topographic limit (1,850 feet MSL) near the City/County jurisdictional boundary in a southeasterly direction to the mouth of the canyon (1,350 feet MSL) at San Fernando Road. The surrounding topography outside of Sunshine Canyon is dominated by mountainous ridgelines that obstruct and/or limit views into the interior canyon from most adjacent properties and uses.

3. The *City of Los Angeles Scenic Highways Plan* identifies the I-5 Freeway and Sesnon Boulevard as scenic roadways. The *City of Los Angeles Proposed Transportation Element* also depicts the I-5 and Sesnon Boulevard as designated scenic highways. However, the I-5 designation only extends southeast to Balboa Boulevard (rather than all the way to the Hollywood Freeway interchange). The Scenic Highways map of the *Los Angeles County General Plan* designates the SR-14 as a second priority roadway for the enhancement of scenic experiences.
4. Surrounding properties are generally located downgradient and at elevations well below the project site's ridgelines. North of the site, the topography descends to about 1,000 feet MSL near the I-5 Freeway at Weldon Canyon. Ridges and canyons are located southwest of the site within the O'Melveny Park area. The highest peak and one of the most prominent features in this area is Mission Point at 2,771 feet MSL. This area descends below 1,500 feet MSL within residential areas located south of Bee Canyon Park. The urbanized areas located southeast of the site are well below the 1,300-foot elevation. These elevational differences in topography between the proposed landfill and existing uses would effectively limit potential visual impacts.
5. The existing southern fill limits of the inactive landfill (i.e., larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the final fill areas from residential uses located to the south and southwest. The highest final fill elevation of the proposed City/County Landfill footprint is 2,000 feet MSL. At this elevation, the top deck area would be higher than the northern perimeter ridgeline, which is 1,825 feet MSL. However, due to the location of the final fill area, which is well within the interior of Sunshine Canyon, exterior perimeter ridgelines would not be

visually impacted.

6. Development of the proposed project would necessitate landform alteration. For example, the landfill footprint would have incremental slope surface areas and/or manufactured benches. The exterior appearance of Sunshine Canyon and its topographic elevations along the southern portion of the project site would remain unchanged. Project development would not occur within the 100 acre open space area, areas along the southern perimeter ridgeline, or within surrounding mitigation sites (i.e., Bee and East Canyons). Associated grading activities and corresponding construction would result in the urbanization of the project site through the introduction of impervious surfaces and industrial-related development. Development would also result in the loss of indigenous vegetation and the introduction of both native and nonnative plant species.
7. When landfilling operations occur in the southern portion of the project site, motorists traveling northbound on the I-5 Freeway would have a clear view of operational activities for approximately 20 to 30 seconds. The project area has many industrial uses proximate to the project site, and motorists using this freeway corridor would view those uses in addition to residential and mountainous terrain. The project site would also be visible from the SR-14 Freeway at the I-5 interchange. Views would also be limited and similar in duration to those described above. Additionally, affected motorists traveling northbound would have just passed through developed areas located on both sides of the I-5 Freeway within the San Fernando Valley. A brief view of the interior of the canyon would also be provided from Foothill Boulevard. For motorists traveling westbound on the I-210 Freeway, the site is visible from a distance of about 6,000 feet (i.e., greater than 1 mile). From this distance, motorists would be able to view landfilling operations near the mouth of the canyon for approximately 20 seconds.
8. The landfill is currently visible from limited residential areas in the community of Sylmar. The existing inactive landfill is visible at such a far distance that it is generally indistinguishable from mountainous terrain in the background. Landfill operations would also be visible during final sequencing of the proposed project from the upper elevations of

O'Melveny Park (i.e., hiking and equestrian trails). Along these trails, vegetative screening is provided.

Reference: For a complete discussion of impacts relating to Aesthetics/Views, please see Section 4.18 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

5.13 CULTURAL RESOURCES

Archaeological

5.13.1 Description of Potential Significant Effect: Site clearance, excavation, and grading activities associated with construction and operation of the proposed project have the potential to unearth previously undiscovered archaeological resources.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 183:** Prior to the commencement of initial earth excavation, specific sections of the project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered archaeological resources. Specific areas within the project site to be resurveyed shall be determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists. Factors to be considered for delineation of areas to be resurveyed will be known site selection factors associated with aboriginal groups suspected of having inhabited the general area. These factors include proximity to water, the type of vegetation (e.g., food source, shelter, and fuel), and the topography (e.g., slope and aspect).
- b. **Mitigation Measure No. 184:** An archaeologist shall be present onsite during major infrastructure work which requires significant surface disturbance.
- c. **Mitigation Measure No. 185:** The landfill operator shall instruct landfill equipment operators how to identify archaeological resources and upon discovery of such

findings immediately report the location of the site to their supervisor. If any evidence of aboriginal habitation is discovered during earthmoving activities, landfill operations will cease in that particular location until a qualified archaeologist has made a determination as to the significance of the site or findings. Any significant archaeological resources shall be recovered to the extent practicable prior to resuming activities in that area of the landfill.

- d. **Mitigation Measure No. 186:** Archaeological resources recovered during surface collection, subsurface excavations, and monitoring, with related records, notes, and technical reports, shall be curated at a regional repository approved by the City.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to archaeological resources identified in the Final SEIR to a less than significant level..

Rationale for Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Five archaeological investigations were conducted within Sunshine Canyon between 1975 and 1997. Each investigation included, in part, (1) a records search for information on previous cultural resource surveys performed in or near the project area, which was conducted at the Archaeological Information Center at the University of California at Los Angeles (UCLA), Institute of Archaeology; and (2) a physical walkover survey of the project site. The records searches did not identify any other known or recorded archaeological sites within a 1-mile radius of the project proponent's property.
2. The 1975 archaeological investigation resulted in the discovery and recordation of one prehistoric/historic archaeological site (CA-LAN-816) within the boundaries of Sunshine Canyon. This site was described as a single sandstone bedrock mortar, a scatter of historic material consisting of oriental porcelain and old bottle glass. The site was mapped adjacent to an intermittent watercourse in the southwest corner of Sunshine Canyon. The 1978, 1991, 1994, and 1997 surveys were unable to relocate the site. It was concluded by both Drs. Clewlow

and Meighan of the UCLA Institute of Archeology, that the site was of minor importance and that any information provided would be of limited value.

3. The 1994 investigation recorded nine archaeological sites within Sunshine Canyon. Each site was individually numbered (SC-1 through SC-9). SC-1 mitigation was completed by avoidance and fencing off the site. SC-2 was determined not to be of cultural (historical) origin, and no further mitigation was required. Sites SC-3 and SC-9 were fully investigated and reported, in addition to sites SC-4, SC-5/6, SC-7, and SC-8.
4. Landfilling activities are not expected to uncover significant archaeological resources because much of the area has already been disturbed by the previous landfill operations and the activities associated with the quarry and the Cascade Oil Field to the south. No archaeological resources were observed in the City portion of the property.

Reference: For a complete discussion of impacts relating to Cultural Resources (Archaeological Resources), please see Section 4.19.1 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

Paleontological Resources

- 5.13.2 Description of Potential Significant Effect:** There is a high degree of probability that site clearance, grading, and excavation resulting from construction and operation of the proposed project will uncover significant paleontological resources.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

- a. **Mitigation Measure No. 187:** Prior to the commencement of initial earth excavation, specific sections of the project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered paleontological resources. Specific sections of the project area to be resurveyed shall be as determined by the intended cut-and-fill areas proposed for landfill

development. As new areas for excavation are identified by the project proponent, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists.

- b. **Mitigation Measure No. 188:** A paleontologist shall be onsite during major infrastructure work that requires significant excavation. In the event that paleontological resources are discovered during grading or excavation, the paleontologist shall be allowed to redirect grading away from the area of exposed fossils to allow sufficient time for inspection, evaluation, and recovery.
- c. **Mitigation Measure No. 189:** The landfill operator shall instruct landfill equipment operators how to identify paleontological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of paleontological resources is discovered during earthmoving activities, landfill operations shall cease in that particular location until a qualified paleontologist has made a determination as to the significance of the findings.
- d. **Mitigation Measure No. 190:** Any significant paleontological resources shall be recovered to the extent practicable. Due to the potential for rapid deterioration of exposed surface fossils, preservation by avoidance is not an appropriate measure. When fossils cannot be removed immediately, the site shall be stabilized to prevent further deterioration prior to data recovery or the fossil location as directed by a professional paleontologist.
- e. **Mitigation Measure No. 191:** The paleontologist shall be retained to perform inspection of the excavation and salvage exposed fossils. Collected fossils shall be curated at a public institution with an educational/research interest in the material. Any curatorial expenses shall be borne by the landfill operator.

Findings: Changes or alterations have been required in, or incorporated into, the proposed project that will avoid or mitigate the significant environmental effects relating to paleontological resources identified in the Final SEIR to a less than significant level.

Rationale for Findings: The following facts and related

mitigation measures are presented in support of these findings:

1. Sunshine Canyon is located in an area underlain by the late Miocene-early Pliocene Towsley Formation consisting of coarse sandstone and conglomerate, shale, and siltstone. This unit is marine and contains localized bone beds and vertebrate remains of Miocene age. The Towsley Formation is known to contain fossils, primarily in areas adjacent to the site. The fossils contained in these units (Soledad Embayment) have proven to be of high scientific value. Sparse fossil remains were encountered during a 1989 walkover survey conducted by a qualified paleontologist within Sunshine Canyon. These fossils included pelecypods (clams), gastropods (snails) in the northeastern canyon, and carbonized plant remains in several areas onsite. These resources were not considered significant.
2. Seven fossil localities were identified within the City portion of project site during the March 1997 field surveys. Although these localities were not identified as containing significant paleontological resources, the Towsley Formation could contain significant fossils adjacent to areas proposed for development.

Reference: For a complete discussion of impacts relating to Cultural Resources (Paleontological Resources), please see Section 4.19.2 of the Draft SEIR, and Tables 3-1 and 4-1 and the Responses to Comments referenced therein in the Final SEIR.

6.0 SIGNIFICANT ENVIRONMENTAL EFFECTS IDENTIFIED IN THE FINAL SEIR THAT CANNOT FEASIBLY BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The City has determined that specific mitigation measures and/or design changes initially presented in the Draft SEIR and subsequently identified in the Final SEIR, agreed to by the facility operator, will result in substantial mitigation of those significant or potentially significant environmental effects identified in the Draft SEIR. However, based on the significance criteria established by the City and presented in the Draft SEIR, these measures and/or design changes will not result in avoiding those significant or potentially significant environmental effects for the following environmental topical issue nor reduce those effects below a level deemed by the City to be less than significant.

6.1 AIR QUALITY (PROJECT-SPECIFIC AND CUMULATIVE)

6.1.1 Description of Significant Effect: Project construction would include the removing of existing vegetation, excavating and grading, constructing of the landfill, constructing and/or relocating ancillary facilities, and installing environmental protection and control systems. Construction-related air pollutant emissions are associated with the site preparation and construction phasing of the proposed project and include fugitive dust emissions and exhaust emissions from construction equipment, material delivery trucks, and workers' vehicles. Construction aspects of the project, such as the installation of the liner system and access road improvements, will be constructed in phases as landfill development occurs. Diesel-powered, earthmoving vehicles or other heavy equipment would be utilized during the grading and construction phasing of the proposed City/County Landfill Project.

As a reasonable worst-case scenario, grading operations are expected to occur during a 10-hour workday. The following vehicles would create emissions during project construction: dozers, an excavator, compactors, scrapers, loaders, rock trucks, water trucks, materials delivery trucks, and construction worker cars and trucks.

Fugitive dust during construction is generated either by a mechanical disturbance to soil (i.e., associated with human activities such as grading operations or agricultural tilling) or by wind-related entrainment of dust particles. Site preparation, clearing, surface grading, excavation, and the use of heavy equipment and trucks on unpaved surfaces have the potential to generate significant quantities of dust during initial site preparation activities.

During operation, vehicles will be utilized to transport refuse to the landfill. Wastes are deposited within prepared cells and covered daily with cover material. The cells are then compacted before the next lift is applied. When landfill capacity is exhausted, a new area is excavated and lined with an impermeable membrane, and cells are formed. Heavy equipment would be used to prepare new landfill cells, and cover and compact refuse on a daily basis. All equipment is projected to operate 10 hours per day. The following heavy equipment would create daily emissions: bulldozers, a grader, compactors, dirt trucks,

excavators, scrapers and water trucks.

Volatile organic emissions are associated with the storage and transfer of fuel to project-generated vehicles. The 220 transfer trucks and 640 refuse collection trucks are anticipated to travel approximately 34,280 miles per day. Based on an average fuel consumption of 5.9 mpg, an estimated 5,810 gallons of fuel may be used daily. All of these vehicles are all assumed to use diesel fuel. Gasoline will be utilized by landfill employees who would be commuting to the site and service vehicles and light-duty vehicles that would transport wastes to the site.

Collected landfill gas (LFG) would be burned in a total of five high-efficiency flares, each with a total volume disposal capacity of approximately six million standard cubic feet per day (scf/day) or 4,167 standard cubic feet per minute (scf/min).

Fugitive dust is produced by daily site operations, including landfilling operations, such as the preparation of new cells, procurement of cover material, wind action on material that has been stockpiled during the initial construction, and truck travel on both the paved access roadway and the unpaved haul route surface to the active working face. Heavy equipment would be utilized to prepare new landfill cells, procure cover materials, and compact refuse on a daily basis. These activities would be subject to erosion and potential fugitive dust emissions. Because dust generally settles on horizontal surfaces, onsite vehicular travel over paved surfaces would also produce fugitive dust emission. Dust is also associated with vehicular travel over unpaved or hard-packed surfaces such as the haul road.

The project area is currently out of attainment for both O_3 and PM_{10} (fine particulate matter). Project construction is projected to produce NO_x and PM_{10} in excess of those levels deemed by the SCAQMD as significant. All other construction related emissions are estimated to remain below both daily and quarterly threshold levels. Emissions from project operations are anticipated to exceed the significance criteria for CO , NO_x , SO_x , ROG and PM_{10} . Construction and operation of cumulative projects will further degrade local air quality, as well as the air quality within the SCAB. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. The greatest cumulative

impact on regional air quality will be the incremental addition of pollutants primarily from increased traffic associated with the development of residential, commercial and industrial projects and the use of heavy equipment and trucks associated with construction of these projects. Emissions of CO and ROG, primarily associated with vehicular travel, as well as SO₂, associated with the combustion of landfill gas, are projected to be significant on a cumulative level.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and will be incorporated into the project:

Mitigation Measure No.19: The following mitigation measures will reduce emissions to the maximum extent reasonably feasible.

- a. The project proponent will maintain equipment in tune per manufacturer's specifications.
- b. The project proponent will use catalytic converters on gasoline-powered equipment.
- c. The project proponent will retard diesel engine injection timing by 2 degrees.
- d. High-pressure fuel injectors will be installed.
- e. Heavy equipment will use reformulated, low-emission diesel fuel.
- f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible.
- g. Where applicable, equipment will not be left idling for prolonged periods.
- h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts). (*Mitigation Measure Section 4.2.11 in Final EIR*)

Mitigation Measure No.20: Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas

will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and control is required. (Mitigation Measure Section 4.2.11 in Final EIR)

Mitigation Measure No.21: Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph. (Mitigation Measure Section 4.2.11 in Final EIR)

Mitigation Measure No.22: Graded areas shall be watered as necessary to reduce dust emissions. (Mitigation Measure Section 4.1.11 in Final EIR)

Mitigation Measure No.23: Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time. (Mitigation Measure Section 4.2.11 in Final EIR)

Mitigation Measure No.24: Construction Equipment

- a. The project proponent will maintain equipment in tune per manufacturer's specifications.
- b. The project proponent will use catalytic converters on gasoline-powered equipment.
- c. The project proponent will retard diesel engine injection timing by 2 degrees.
- d. High-pressure fuel injectors will be installed.
- e. Heavy equipment will use reformulated, low-emission diesel fuel.
- f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible.
- g. Where applicable, equipment will not be left idling for prolonged periods.
- h. The project proponent will curtail (cease or reduce)

construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts). (Mitigation Measure Section 4.2.12 in Final EIR)

Mitigation Measure No.25: Refuse Trucks

The following measures will be applied to the project proponent's operated trucks that utilize the project site.

- a. Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.
- b. Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.
- c. Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.
- d. The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.
- e. When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.
- f. Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility. (Mitigation Measure Section 4.2.12 in Final EIR)

Mitigation Measure No.26: Truck Travel and Fugitive Dust Emissions

- a. To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.

- b. Curbs and gutters shall be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted.
- c. For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill. (*Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion, TRC Environmental Solutions, Inc., May 2, 1997*).
- d. For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted. (*Mitigation Measure Section 4.2.12 in Final EIR*)

Mitigation Measure No.27: Heavy Equipment Operations

- a. Operations shall be restricted to encompass no more than a 10-acre active working face area.
- b. The disturbed area (subject to the surface erosion) shall be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill. (*Mitigation Measure Section 4.2.12 in Final EIR*)

Mitigation Measure No.28: Site Erosion

- a. To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.
- b. Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot

maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.

- c. A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.
- d. An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface. (*Mitigation Measure Section 4.2.12 in Final EIR*)

Findings: Pursuant to Public Resources Code § 21081(a)(1) and CEQA Guidelines § 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project which will substantially lessen the significant environmental effects relating to air quality, as identified in the Final SEIR, however, not to a level below significance. In particular, the City finds that implementation of feasible mitigation measures will substantially lessen construction air quality impacts, but that such impacts will remain significant because NO_x, and PM₁₀ emissions will exceed the thresholds of significance. Emissions from project operations are anticipated to exceed the significance criteria for CO, NO_x, SO_x, ROG and PM₁₀. Pursuant to Public Resources Code § 21081(a)(3) and CEQA Guidelines § 15091(a)(3), there are not feasible mitigation measures available or project alternatives that would fulfill the basic objectives of the project and mitigate air quality impacts below a level of significance. The project alternatives identified in the Draft SEIR, Section 5.0, would not result in a reduction in daily project emissions since similar air quality impacts would result at other in-County or remote landfills that would still be necessary should the proposed project not be approved. A further description of alternatives that were considered and then rejected is provided in Section 7 of these CEQA Findings. As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because of overriding considerations.

Rationale for Findings: The following facts are presented in

support of these findings:

1. As defined by the SCAQMD CEQA Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants. During construction of the project, emissions for NO_x, and PM₁₀ would result in an exceedance of the SCAQMD significance thresholds after the incorporation of mitigation measures. Operation of the project would result in exceedances of the CO, NO_x, SO_x, ROG, and PM₁₀ criteria and would remain significant after the incorporation of mitigation measures.
2. The identified air quality impacts relate predominantly to necessary construction and operational aspects of the landfill project and/or the cumulative development of related projects in conjunction with the proposed project, and are based on the effects resulting from operations of heavy equipment for site construction, trucks that utilize the project site, and refuse trucks accessing the project site. Feasible mitigation measures and control efficiencies for each dust-generating and other operation, paved roads, unpaved roads, heavy operating equipment, and site erosion, have been included and required in the project to mitigate air quality impacts to the extent feasible.
3. Mitigation for exhaust emissions impacts from heavy equipment necessary to construct and operate the landfill is limited. Mitigation Measure Nos. 19 and 26 will control to the maximum extent reasonably feasible. Fugitive dust impacts from construction, physical site disturbance, material deliveries, employee commuting and potential wind erosion during high wind episodes will be mitigated through the requirements contained in Mitigation Measure Nos. 27, 28 and 29 which will reduce the amount of dust generated.
4. These mitigation measures would substantially reduce impacts; however, even with their implementation, project-generated and project-related cumulative air quality impacts are considered significant and unavoidable, given the nature of the project as a sanitary landfill for the disposal of municipal solid waste from the surrounding communities. These unavoidable impacts cannot be alleviated even with a reduced volume capacity or other design modifications that would be economically infeasible and/or would still result in significant environmental impacts on air quality. A reduced volume capacity landfill would not ensure sufficient disposal capacity for the City

and County and would not provide a minimum 15 years of disposal capacity for the City as called for by State law. The project is located proximate to City and County generated waste streams. Expanding the existing landfill footprint and operation at this location, instead of developing a new landfill at some undisturbed site, which would not be served as well by the existing transportation system, would minimize significant environmental impacts. The City requires adequate landfill capacity within its own borders to control its destiny and be able to provide a necessary utility and service for existing residents and businesses and future development projected by the general plan. Transporting municipal solid waste to some remote location would still result in the air quality emissions generated by the refuse trucks that collect and dispose of trash.

Reference: For a complete discussion of impacts relating to Air Quality (Construction and Operations), please see Section 4.2 of the Draft SEIR; Appendix D2 of the Final SEIR, containing revisions to Section 4.2 of the Draft SEIR; Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein; Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions, Topical Issue 25: Performance of a Health Risk Assessment, and Topical Issue 27: Revised Air Quality Data contained in the December, 1998 Responses to Comments Public Hearing of the General Plan Amendment/Zone Change (October 29, 1998).

7.0 FINDINGS REGARDING ALTERNATIVES TO THE PROJECT

As described in Sections 1.9 and 5.0 of the Draft SEIR, several alternatives to the proposed project were considered and described in the SEIR in order to present a range of reasonable choices among those options available to the City and/or the project proponent. These included three onsite alternatives to the proposed project (i.e., No Project, Reduced Volume, and Immediate Combined City/County Landfill Operations) in addition to consideration of several alternative locations for the proposed project in Los Angeles County, outside of Los Angeles County, and in remote facilities located either in-state or outside the state. The following findings address the feasibility of each alternative and whether it would be environmentally superior to the proposed project. "'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Pub. Resources Code § 21061.1

Even with the implementation of feasible mitigation measures that will substantially lessen construction and operation air quality impacts, such impacts will remain significant. Regarding findings for alternatives, Section 15091 of the State CEQA Guidelines provides for a finding that "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (State CEQA Guideline § 15091 (a)(3)) This guideline section also provides that if this finding is made, "the finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives." In making these findings, the ability of the various alternative to meet the project's development objectives and the solid waste objectives to meet the anticipated short-, mid- and long-term disposal needs within the region, was considered. The objectives considered included the following:

Development Objectives

- ▶ develop a solid waste landfill on project proponent-owned land within the City and County jurisdictions that is primarily disturbed due to extensive landfilling operations that have taken place over a 30-year period;
- ▶ develop a landfill footprint within the City to connect with land area in the County (±42 acres) and to the operational County Landfill, thus providing combined landfilling operations at a single landfill footprint in Sunshine Canyon;
- ▶ perform landfilling operations within a single landfilling area in either jurisdiction using a cut-and-cover fill method for landfilling;
- ▶ ensure corporate commitment to meet environmental, health, and safety goals, and exceed regulatory standards and requirements during landfilling construction, operation, and closure;
- ▶ reduce the project proponent's long-term capital outlay for site infrastructure by utilizing existing onsite infrastructure improvements, including utilities, an improved site entrance for ingress/egress of traffic, an onsite access road, improved scale facilities and check-in area (for weighing and accounting for the wastes to be deposited), surface drainage improvements, and other environmental protection and control systems;
- ▶ effectively utilize the project proponent's existing transfer stations/material recovery facilities (MRFs), solid waste collection company services, and other related facilities in the Los Angeles region to support

the operation of the proposed City/County Landfill Project;

- ▶ generate 35 new full-time jobs within Los Angeles County at the project site and provide short-term construction jobs during each sequence of landfill development; and
- ▶ provide cost-effective, short-, mid-, and long-term solid waste disposal capacity at the project site for residences and businesses within the Los Angeles region.

Solid Waste Objectives

- ▶ provide efficient solid waste management and disposal capacity to the City and County by developing a landfill facility to avert an identified short-term and potential future long-term solid waste disposal capacity shortfall;
- ▶ provide both City and County jurisdictions the opportunity for long-term solid waste disposal capacity;
- ▶ recover, recycle, and/or reuse waste materials that would otherwise be disposed of at the City/County Landfill by providing a green waste/wood waste recycling area;
- ▶ minimize impacts on air quality within the South Coast Air Basin (SCAB) by providing additional disposal capacity within the Los Angeles region, thereby reducing emissions from transporting refuse longer distances;
- ▶ provide cost-effective disposal options for the City, County, and private haulers at a landfill facility within the region to minimize transportation costs;
- ▶ minimize significant impacts on environmental resources associated with the development of new landfill sites (i.e., proposed sites located within undisturbed canyon areas or remote desert locations) by using areas of the existing inactive landfill and other areas within Sunshine Canyon that are primarily disturbed and that have infrastructure in place to readily accommodate future development; and
- ▶ facilitate local and regional efforts directed toward attaining solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the *City of Los Angeles Source Reduction and Recycling Element* (City SRRE), the *City of Los Angeles Solid Waste Management Policy Plan* (CiSWMPP), the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, the *Los Angeles County Countywide Siting Element* (CSE), the *County of Los Angeles Source Reduction and Recycling Element* (County SRRE), and formally executed agreements between the County and the City that identify

the need for the maximum technically and environmentally feasible expansion of landfill sites.

As discussed above in Section 2.2 of these CEQA Findings, the preferred alternative is to combine the separate landfill operations of the proposed project into a single working face immediately upon authorization of landfiling in the City and County portions of Sunshine Canyon. This combined development of land within both jurisdictions would result in one landfill footprint being constructed in Sunshine Canyon. The landfill footprint would eventually encompass ±451 acres and would result in a net waste disposal capacity of 90 million tons of potential disposal capacity, comprised of 55 million tons in the proposed landfill within the City and 35 million tons within the County. Of the total County capacity, 17 million tons would be in the permitted and operational County Landfill and 18 million tons would be within the additional ±42 acres and airspace developed within the County. This combined City/County development would provide approximately 26 years of disposal capacity, assuming an average disposal rate of 11,000 tpd and 66,000 tons per week. This proposed landfill footprint would abut and encompass ±80 acres of the existing inactive landfill located in the City. This preferred alternative has been discussed in the SEIR as the Immediate Combined City/County Landfill Operations Alternative. Based on the project's administrative record, the City makes the following findings concerning each of the identified alternatives.

7.1 NO PROJECT ALTERNATIVE

Comparison of the Effects of the No Project Alternative to the Effects of the Proposed Project (site specific):

1. The No Project Alternative would reduce site-specific environmental impacts in comparison to the proposed project. Impacts on air quality, earth, surface and groundwater, biota, noise, land use, risk of upset, transportation and circulation, public services, utilities, aesthetics/views, and cultural resources would be avoided or lessened. Therefore, on a site-specific basis only, this alternative is environmentally superior to the proposed project.
2. If the No Project Alternative is approved, the inactive landfill in the City would proceed with its closure and postclosure maintenance. Any development in this area would be in response to those activities mandated by.

State law.

3. The project site in the City would retain its existing land use designation of "Open Space" and its zoning designation of "A1-1-K-O" in conformance with the recently adopted Granada Hills-Knollwood Community Plan. Under that designation, the uses permitted by right under the corresponding "A1" zone include one-family dwellings, community parks, golf courses, and extensive agricultural uses. Development of these uses would not be pursued by the project proponent in the foreseeable future because of the existing operational County Landfill and the inactive landfill's State requirements for closure and postclosure maintenance.

Comparison of the Effects of the No Project Alternative to the Effects of the Proposed Project (regional):

1. Under the No Project Alternative, the proposed project would not be developed within Sunshine Canyon. This would preclude development of a combined landfill facility with a net disposal capacity of 90 million tons. The operational County Landfill, with a disposal capacity of approximately 17 million tons, will continue to operate, accepting an average intake rate of 6,000 tpd. Vehicles accessing that facility will be allowed to continue using the access roadway (located in both jurisdictions) for construction and operation purposes. That landfill's anticipated operational site life is 10 years; however, that site life may be extended if future landfill development occurs within the upper reaches of Sunshine Canyon or if the proposed project is denied. Therefore, if authorized, this landfill has the future potential to increase its disposal capacity to 70 million tons.
2. Implementation of the No Project Alternative could result in the potential expansion of the County Landfill within the upper reaches of Sunshine Canyon, resulting in increased environmental impacts on biological resources (specifically, the loss of approximately 3,200 oak trees and 75 big-cone Douglas fir trees, as well as other significant biological resources within the project site).
3. The No Project Alternative would not effectively and efficiently use land area that is primarily disturbed due to years of landfilling activities, or use onsite

infrastructure already available to accommodate landfill operations.

4. This alternative would result in an increased reliance on existing in-County landfills, thereby increasing environmental impacts at these facilities to a level of significance.
5. If the No Project Alternative is approved, environmental impacts would occur at existing in-County landfills, out-of-County landfills, or at potential new landfill sites, if developed. Many of these facilities are located outside of the jurisdiction or authority of the City and County. The increased use of other landfill facilities has the potential to create significant impacts and increase vehicular traffic, air emissions, and noise pollution in the vicinity of those affected landfills. Similarly, if existing landfill facilities increase their daily and weekly intake rates to accommodate additional waste demand, remaining disposal capacity will be reduced and disposal capacity will be diminished. Additionally, if new landfill facilities were developed other than the proposed project, such as in-County or remote landfill facilities, undisturbed natural areas would be impacted, and physical effects on numerous resources would occur.
6. This alternative would not effectively use the project proponent's existing MRFs/transfer stations, solid waste collection company services, and other related facilities to support the operation of the proposed project.
7. The No Project Alternative would not recover, recycle, and/or reuse waste materials that would otherwise be disposed of in landfills by providing a an onsite green waste/wood waste recycling area.
8. A.B. 939 mandates that both the City and County provide at least 15 years of disposal capacity. Their planning efforts have focused on mid- and long-term disposal capacity. In recognition of A.B. 939, both jurisdictions have analyzed capacity needs and provided a full range of feasible options to address an impending shortage of local disposal capacity and diminished in-County landfill capacities. One of those options includes the development of in-County landfills such as the proposed project. Implementation of the No Project Alternative would preclude that option, even though this option is acknowledged as being feasible, and would help resolve

capacity limitations in the region.

9. The No Project Alternative would not facilitate local and regional efforts directed toward the attainment of solid waste disposal capacity objectives for the City and County contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the City and County SRREs, CiSWMPP, the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, and the CSE.
10. The No Project Alternative would not provide cost-effective disposal options for the City, County, and private haulers at a facility within the region to minimize transportation costs.
11. This alternative would result in diminished economic revenues to the City and County in the form of tipping fees and business license taxes.
12. The environmental impacts attributable to the proposed project are directly linked to the amount of waste being generated offsite and transported onsite for disposal. It is expected that, even with source reduction and recycling and other forms of waste technologies being used by the City and County to extend the life of existing landfills, waste will continue to be generated regardless of whether the proposed project is approved or not. In response to existing and future waste demands in the region, the approval of the No Project Alternative would only exacerbate an existing problem and burden existing landfill facilities. In that regard, the adoption of this alternative will not ensure these jurisdictions mid- or long-term disposal capacity at this project site or provide feasible solutions to a regional solid waste disposal capacity problem.

Project Objectives: Because no site development would occur under the No Project Alternative, it would not achieve the project's development or solid waste objectives.

Finding: With this Alternative, new environmental impacts projected to occur from development of the proposed project would be avoided, therefore, this Alternative would be an environmentally superior alternative to the proposed project in terms of its site-specific effects but it would not be environmentally superior to the proposed project in terms of its regional effects. However, it is found pursuant to Public

Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the SEIR. The No Project Alternative would not be environmentally superior to the proposed project in terms of its regional effects and it would not meet the project's development or solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the No Project Alternative, please see Sections 1.9.3 and 5.2.1 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.2 REDUCED VOLUME ALTERNATIVE

Comparison of the Effects of the Reduced Volume Alternative to the Effects of the Proposed Project (site specific):

1. This alternative would result in less significant environmental impacts on a site-specific basis only. Under the Reduced Volume Alternative, a landfill configuration encompassing ±60 acres would be developed that includes ±44 acres in the City and ±16 acres in the County. This alternative would provide an average waste intake of 5,000 tpd, have an estimated net disposal capacity of approximately 8.4 million tons, and result in an operational site life of approximately five years in comparison to an expected 26-year site life for the proposed project. The Reduced Volume Alternative would require approximately 2.9 million cubic yards of daily, intermediate, and final cover material. The lowest elevation of excavation is approximately 1,525 feet MSL. Similar to the proposed project, this alternative would reach an elevation of 2,000 feet MSL at its top deck area. Landfill development would avoid streambed areas of the canyon and other undisturbed areas.
2. In comparison to the proposed project, this alternative would lessen site-specific impacts for the following reasons: earth resource impacts would be reduced because grading and excavation quantities would be reduced; dust impacts would be reduced on the site once the landfill reaches capacity after five years of operation; LFG emission impacts would be reduced on the project site

because less LFG would be generated; mobile air emissions would be reduced in the short term once the landfill's capacity is exhausted; biological resource impacts would be reduced because the removal of sensitive plant communities would be avoided; land use impacts would be reduced because there would be an earlier end use conversion due to the shortened site life; less litter would be generated because disposal in the City would cease after five years of operation; less transportation and circulation impacts would occur, once the landfill's capacity is exhausted, due to a smaller volume of vehicles onsite; and cultural resource impacts would be reduced because undeveloped areas that would include paleontological resources would not be disturbed.

3. If this alternative is approved, the County Landfill would continue to operate independently of, and separately from, the Reduced Volume Alternative. The Reduced Volume Landfill footprint would however eventually connect with the County Landfill. This landfill would operate independent environmental control systems (e.g., landfill liner, LCRS, LFG extraction and flaring system) separate from the County Landfill. However, ancillary uses such as the access road, scales, and administrative offices would be shared. Implementation of this alternative would require the development of a working arrangement to exercise common power over the entire project site (i.e., ±60 acres in both jurisdictions). This arrangement would authorize the joint development and mutual use of ancillary facilities within the City and County.

Comparison of the Effects of the Reduced Volume Alternative to the Effects of the Proposed Project (regional):

1. Due to the Reduced Volume Alternative's shortened site life, regional environmental impacts would be more significant than the proposed project because the waste stream would need to be transferred to other landfill facilities within, or outside of, the region. For that reason, significant regional impacts would occur because the burden of providing additional disposal capacity would be placed on more distant in-County or out-of-County landfill facilities and/or potentially remote landfill locations.
2. In comparison to the proposed project, the Reduced Volume Alternative would result in greater, regionally

significant environmental impacts including significant air quality impacts from mobile emissions that would result due to greater travel distances to other landfill facilities that would be located out-of-County; increased LFG generation would occur at these other new and/or expanded landfill facilities in the mid and long term; increased dust generation would occur at these other facilities; significant biological resource impacts would occur at other new and/or expanded landfill facilities in the mid- and long-term periods; and increased litter generation would occur at these other facilities.

3. In addition, the Reduced Volume Alternative would result in significant regional transportation and circulation impacts due to the use of regional transportation such as rail or freeway systems, in addition to localized impacts resulting from waste being transported to other landfill facilities; significant public service impacts would result if waste was transported to remote landfill locations due to the inability of these sites to provide adequate fire and paramedic emergency services; significant impacts on utilities would occur by underutilizing a local solid waste landfill that could provide substantial solid waste disposal capacity for jurisdictions in need of that capacity; energy conservation impacts would result from the increased use of fossil fuels during the mid- and long-term periods associated with increased haul distances; and significant impacts on cultural resources would occur at other new and/or expanded landfill facilities in the mid- and long-term periods.
4. Implementation of the Reduced Volume Alternative would not reduce the project proponent's long-term capital outlay for site infrastructure by using existing onsite infrastructure improvements, including utilities; or by using an improved site entrance for ingress/egress of traffic onsite; an onsite access roadway; improved scale facilities and check-in area (for weighing and accounting for waste to be deposited); surface drainage improvements; and other environmental protection and control systems.
5. The Reduced Volume Alternative would not provide cost-effective, mid- and long-term solid waste disposal capacity at the project site for residences and businesses within the Los Angeles region.

6. Implementation of the Reduced Volume Alternative would not provide efficient solid waste management and disposal capacity to the City and County by developing an essential landfill facility necessary to avert an identified long-term disposal capacity shortfall.
7. Implementation of the Reduced Volume Alternative would not facilitate local and regional efforts directed toward the attainment of solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the City and County SRREs, CiSWMPP, the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, and the CSE.

Project Objectives: The Reduced Volume Alternative would not implement many of the project objectives.

Finding: Although the Reduced Volume Alternative would be environmentally superior to the proposed project in terms of its site-specific effects, it would not be environmentally superior to the proposed project in terms of its regional effects. However, it is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the Reduced Volume Alternative described in the SEIR. The Reduced Volume Alternative would not be environmentally superior to the proposed project in terms of its regional effects and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the Reduced Volume Alternative, please see Sections 1.9.4 and 5.2.2 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.3 IMMEDIATE COMBINED ALTERNATIVE

Comparison of the Effects of the Immediate Combined City/County Landfill Operations Alternative to the Effects of the Proposed Project:

1. Under the Immediate Combined City/County Landfill Operations Alternative, project development would immediately result in landfilling operations being commenced within one landfill footprint located in Sunshine Canyon. In comparison to the proposed project, this alternative would have a similar landfill footprint configuration encompassing ±451 acres. Also, like the proposed project, this landfill footprint would connect with the operational ±215 acre County Landfill. This alternative would provide a net disposal capacity of 90 million tons, and unlike the proposed project, landfilling operations would occur immediately at one single working face during the first 18 to 24 months rather than at two separate working faces, and there would be a single, joint intake area with a single set of scales and supporting administrative facilities. Approximately 11,000 tpd of waste would be received at one landfill footprint. The site life would be approximately 26 years, assuming a constant intake rate of 11,000 tpd and 66,000 tons per week.
2. Development sequencing for this alternative would result in three sequences similar to the proposed project. Under this alternative, development of the landfill footprint would initiate in the City jurisdiction, abut and overlay portions of the inactive landfill (Sequence A), proceed in a northerly direction across the City and County boundary, and connect to the operational County Landfill (Sequence B). Once interim fill elevations are reached, the landfill footprint would extend back into the City jurisdiction (Sequence C).
3. Similar to the proposed project, implementation of this alternative would require some form of agreement between the City and the County to exercise power over the entire project site. This would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill. Therefore, existing permitting requirements and regulatory obligations in connection with that landfill would effectively be maintained and, if necessary, modified or amended to reflect the resulting provisions established under the subject agreement.
4. Under this alternative, less significant impacts would occur (for up to two years) because landfilling

operations would be contained at a single working face area. In comparison to the proposed project, some environmental impacts would be reduced. During the first 18 to 24 months, less daily fugitive dust emissions would be generated because landfilling operations would be contained at one working face area instead of two separate working faces. During high-wind episodes (i.e., Santa Ana wind conditions), landfilling operations would be performed at wind-protected areas of the site within either jurisdiction. Potential offsite fugitive dust emissions would be reduced due to the flexible location of landfilling operations. During the first 18 to 24 months, the landfilling operations would result in less significant litter generation because landfilling would be confined to wind-protected areas of the project site during high-wind conditions. Offsite windblown litter would be reduced due to the flexible location of the active working face area.

5. During the first 18 to 24 months, less significant worker safety impacts would result due to the consolidation of heavy equipment and the increased ability to control the routing of waste-hauling vehicles ingressing and egressing the project site. This would result in less onsite vehicular congestion, facilitate safer turning movements, and increase driver visibility. This alternative would provide easier access to City and County Fire Departments and other emergency personnel due to reduced onsite vehicle congestion as a result of confining landfilling operations to one working face. The use of a single working face area would result in the need for less water consumption for dust control purposes.
6. Implementation of this alternative would not result in any areawide or regional impacts that would be greater than the proposed project. Overall, this alternative would be considered environmentally superior to the proposed City/County Landfill because environmental impacts would be less for at least a two-year period.
7. Development of this alternative would reduce the long-term capital outlay necessary for infrastructure improvements because in-place infrastructure would be used immediately. By reducing the long-term capital costs for the project, the project proponent would be able to provide cost-effective tipping fees for the City, County, and private haulers at a centrally located, high-

volume landfill facility.

8. In comparison with the proposed project, this alternative would meet all development and solid waste objectives. Implementation of this alternative would facilitate the waste planning efforts of the City and County necessary to meet their short-, mid-, and long-term planning needs.

Project Objectives: The Immediate Combined City/County Landfill Operations Alternative would implement all of the project objectives.

Finding: Implementation of the Immediate Combined City/County Landfill Operations Alternative would be environmentally superior to the proposed project, due to reduced effects on air quality, worker safety, and fire and emergency services during an approximately 2 year period. The Immediate Combined City/County Landfill Project Alternative is a feasible project alternative because the project objectives would be met. As discussed below, the Immediate Combined City/County Landfill Operations Alternative would be an environmentally superior alternative and is the preferred project. Therefore, the City finds that this alternative is feasible and more desirable than the proposed project and should be implemented for the reasons stated above.

Reference: For a complete discussion of impacts relating to the Immediate Combined City/County Landfill Project Alternative, please see Sections 1.9.5, 5.2.3 and 5.6 of the Draft SEIR; Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein; and Topical Issue 23: Immediate Combined City/County Landfill Operations Alternative contained in the December, 1998 Responses to Comments Public Hearing of the General Plan Amendment/Zone Change (October 29, 1998).

7.4 POTENTIAL/PROPOSED LANDFILL SITES IN LOS ANGELES COUNTY

7.4.1 Proposed Elsmere Solid Waste Management Facility

Comparison of the Effects of the Proposed Elsmere Solid Waste Management Facility Alternative to the Effects of the Proposed Project:

1. The proposed Elsmere Solid Waste Management Facility is located southeast of the City of Santa Clarita and 0.5 mile northeast of the existing Antelope Valley Freeway

(SR-14) and Golden State Freeway (I-5) interchange. The project site encompasses ±1,643 acres within the congressionally designated boundaries of the Angeles National Forest currently being maintained for watershed protection, open space, wildlife habitat, and recreation, and ±1,125 acres located on adjacent private lands. Some form of land exchange would be necessary to remove the Angeles National Forest designation on the project site. The landfill disposal area and associated facilities would occupy ±900 acres, with the remainder of the property maintained as an open-space area.

2. The landfill design would provide an airspace volume of 190 million tons of disposal capacity located on ±720 acres. The facility would operate 24 hours per day, 6 days per week (Monday through Saturday), and would accept up to a maximum of 16,500 tpd of waste and recyclables. It is estimated that approximately 765 tpd would be exported as recycled material and 3,635 tpd would be reused at the landfill (e.g., mulch, daily cover, road base material). The site life is expected to range between 32 and 50 years, depending on the rate of disposal.
3. The implementation of this facility would result in greater significant impacts on earth resources than the proposed project due to the extent of landform alteration and quantity of onsite cover material excavated. The facility would cumulatively contribute greater emissions to the South Coast Air Basin (SCAB) due to the amount of daily tonnage received and increased truck emissions. The project would not meet the Angeles National Forest forest-wide standards and guidelines for development of "sanitary landfills." Development of this proposed use would reduce open-space acreage in Los Angeles County. Impacts would also be significant on future users of both the Whitney Canyon and Rim of the Valley Trails.
4. The proposed Elsmere Solid Waste Management Facility does not meet the objectives of the proposed project because implementation of this alternative would not be developed on property that has been disturbed. Instead, development of this landfill would result in landfilling within an area that is undisturbed and has no immediate infrastructure to accommodate such activities. In comparison to the proposed project, this alternative would result in greater environmental impacts as a result of project development due to the amount of excavation

and grading, air quality impacts, loss of oak trees and sensitive animal species, light and glare impacts associated with nighttime operations, land use impacts, traffic congestion impacts, loss of recreational uses, and aesthetics/views.

5. This alternative would result in less significant impacts on hiking and equestrian trails because an equestrian and hiking facility is proposed to be located east of the main access road. Parking for approximately 30 vehicles and horse trailers and a 1,500-square-foot corral area would be provided. The equestrian facility would occupy approximately 2 acres, and the trail network would extend 3 to 5 miles. The equestrian facility and hiking trail would be maintained by landfill staff and equipment.

Project Objectives: The proposed Elsmere Solid Waste Management Facility Alternative would not implement the majority of the project objectives.

Finding: The proposed Elsmere Solid Waste Management Facility Alternative, overall, would result in greater impacts than the proposed project, and for that reason would not be environmentally superior to the proposed project. Implementation of the proposed Elsmere Solid Waste Management Facility Alternative would not implement the majority of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the Elsmere Solid Waste Management Facility Alternative described in the SEIR. The Elsmere Solid Waste Management Facility Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the Elsmere Solid Waste Management Facility Alternative, please see Sections 1.9.6, 5.2.4 and 5.7.1 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.4.2 Potential Blind Canyon Landfill

Comparison of the Effects of the Potential Blind Canyon Landfill Alternative to the Effects of the Proposed Project:

1. The Blind Canyon Landfill project site is located north of the Ronald Reagan Freeway (SR-118) at the Ventura County border within unincorporated Los Angeles County. The site lies in undeveloped mountainous terrain, and the western portion of the site and access corridor lie within unincorporated Ventura County. Development, including single-family and multifamily residences and a church, has occurred in areas outside of the base of the canyon walls, west and south of the landfill site and both north and south of the freeway. Blind Canyon encompasses $\pm 1,010$ acres; ± 530 acres would ultimately be used for landfiling. The proposed operation would be open to the public Monday through Saturday, 6:00 a.m. to 5:00 p.m. The landfill would have a disposal capacity of 130 million tons and a site life of 25 years based on an anticipated intake rate of 16,500 tpd.
2. The potential Blind Canyon Landfill would create greater significant impacts on earth resources than the proposed project due to the extent of excavation and grading, landform alteration, change in topography, and the potential for landslide and block-slide movement. In addition, the site would require the construction of an offsite access road for internal traffic movement. This project would result in more significant air quality impacts associated with a waste intake rate of 16,500 tpd; impacts on surface waters due to clearing and grading of a large, undisturbed canyon area resulting in increased sheet flow and sediment loading; and substantial impacts on biological resources located within Significant Ecological Areas (SEAs) 20 and 21 that provide corridors for gene flow and species movement between the Santa Monica and San Gabriel Mountains.
3. In addition, the potential Blind Canyon Landfill would result in more significant impacts than the proposed project, including direct impacts on the proposed uses within the Santa Monica Mountains Conservancy Park; impacts on the regional water supply distribution and service resulting from annexation into an area not currently served by a water purveyor; aesthetic and view impacts associated with site visibility from SR-118, which is a proposed scenic highway; and impacts on fossil resources located within the potential Blind Canyon Landfill footprint.

4. The potential Blind Canyon Landfill does not meet the objectives of the proposed project because implementation of this alternative would create a landfill in an undisturbed canyon area rather than develop a landfill in a primarily disturbed area.
5. The potential Blind Canyon Landfill would generate less traffic and circulation impacts and result in less land use impacts due to its isolated location.
6. The potential Blind Canyon Landfill, overall, would result in greater impacts than the proposed project. Additionally, the project proponent cannot reasonably acquire, control, or own this subject site. This alternative would not be environmentally superior to the proposed project.

Project Objectives: The potential Blind Canyon Landfill Alternative would not implement the majority of the project objectives.

Finding: The potential Blind Canyon Landfill Facility Alternative, overall, would result in greater impacts than the proposed project, and for that reason would not be environmentally superior to the proposed project. Implementation of the potential Blind Canyon Landfill Facility Alternative would not implement the majority of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the potential Blind Canyon Landfill Facility Alternative described in the SEIR. The potential Blind Canyon Landfill Facility Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the potential Blind Canyon Landfill Facility Alternative, please see Sections 1.9.6, 5.2.4 and 5.7.2 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.5 OUT-OF-COUNTY LANDFILL SITE ALTERNATIVE

7.5.1 El Sobrante Landfill

Comparison of the Effects of the Proposed El Sobrante Landfill Expansion to the Effects of the Proposed Project:

1. The proposed El Sobrante Landfill Project is a lateral and vertical expansion at the existing 178-acre El Sobrante Landfill project site. This site is located in western Riverside County, 7 miles southeast of the City of Corona and east of the I-15 Freeway. Specifically, it is located southeast of the I-15 Freeway and Cajalco Road interchange. The site encompasses ±1,322 acres, ±645 acres of which are planned for development (i.e., 467 acres for the expansion site and 178 acres comprise the landfill site). The expanded landfill is estimated to have a total disposal capacity of 108 million tons (approximately 100 million tons for expansion and 8 million tons for the existing landfill), allowing an intake rate of 10,000 tpd during a 30-year period.
2. The development of this expansion would result in the disturbances of ±645 acres, and much of this area is considered ecologically sensitive. The proposed expansion would result in greater landform alteration than the proposed project because the landfill would rise in elevation to 530 feet above existing ridgelines, creating significant and unavoidable aesthetic/view impacts at distant locations.
3. Air quality impacts would be greater due to waste-hauling vehicles traveling longer distances to access this facility. Transportation and circulation impacts would be regionally significant due to longer hauling distances and increased truck trips. Water quality impacts would be greater due to the quantity of surface runoff leaving the landfill, its potential effect on the Temescal Wash (i.e., quality of runoff), and the occurrence of flooding on the access road and bridge near the project site. The development of this project would result in unavoidable significant impacts on the federally endangered species and other sensitive species. Due to nighttime (24-hour-per-day) landfilling operations, an artificial lighting source would be introduced, illuminating the night sky.
4. Although the El Sobrante Landfill expansion would feasibly attain some of the objectives of the proposed project, its implementation would not provide sufficient

disposal capacity in-County or provide tipping fee revenues to the City or County. In comparison to the proposed project, the El Sobrante Landfill would result in increased hauling costs and tipping fees, and would not provide a landfill proximate to City- or County-generated wastes.

5. Because of its remote location, this alternative would create fewer impacts on adjacent land uses than at the project site. The project site is located in an area predominantly removed from existing residential developments.
6. The El Sobrante Landfill expansion would create greater significant impacts on the environment than the proposed project. This alternative would not be environmentally superior to the proposed project.

Project Objectives: The proposed El Sobrante Landfill expansion would not implement the majority of the project objectives.

Finding: The proposed El Sobrante Landfill Expansion Alternative, overall, would result in greater impacts than the proposed project, and for that reason would not be environmentally superior to the proposed project. Implementation of the proposed El Sobrante Landfill Expansion Alternative would not implement the majority of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the proposed El Sobrante Landfill Expansion Alternative described in the SEIR. The proposed El Sobrante Landfill Expansion Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the proposed El Sobrante Landfill Expansion Alternative, please see Sections 1.9.7, 5.2.5 and 5.8 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.6 WASTE MANAGEMENT TECHNOLOGIES AND STRATEGIES

Comparison of the Effects of the Alternative Waste Management Technologies and Strategies to the Effects of the Proposed Project:

1. Alternative Waste Management Technologies and Strategies analyzed within the SEIR include source reduction, recycling, composting, waste-to-energy, and alternative daily cover materials (ADCMs). Waste management technologies and strategies are included as part of an overall solution or strategy for preserving disposal capacity. A.B. 939 established a hierarchy of waste management practices, placing source reduction as the first and best method of handling solid wastes, followed by recycling and composting, and finally landfilling or transformation. Within the context of this hierarchy, increased source reduction, recycling, and composting are considered a means to extending the life of landfills. Second, local jurisdictions should efficiently use the disposal capacity at existing landfills. Third, local jurisdictions should site a new landfill in-County. Finally, jurisdictions may seek and establish either short- or long-term agreements for waste exportation to other jurisdictions.
2. It was concluded by the City that even with the implementation of advanced and aggressive waste management alternatives and ADCMs, landfills would still be needed to adequately provide for the amount of waste being generated. Therefore, these waste management strategies and technologies are not considered viable as stand-alone alternatives to the proposed project. Although these options are vital parts of an integrated waste management solution, and necessary for reducing and diverting the amount of waste disposed of in landfills, these technologies and strategies alone cannot resolve the need for necessary disposal capacity in-County and effectively ensure adequate public health and safety. Therefore, these strategies and technologies are not considered by themselves as feasible alternatives to the proposed project. These alternatives, collectively, would not meet many of the development or solid waste objectives of the proposed project.
3. Waste management technologies and strategies would result in the following impacts in comparison to the proposed project: diminished opportunity for the City and County

to establish and maintain adequate short- and long-term solid waste landfill disposal capacity in their jurisdiction as required by A.B. 939; increased reliance on existing in-County landfills, thereby increasing potential environmental impacts at these facilities, necessitating additional landfill expansions and more rapid depletion of the County's long-term disposal capacity; and increased reliance on the exportation of City and County-generated waste to landfills located out-of-County and/or out-of-State, thereby increasing potential environmental impacts (e.g., air quality, traffic, and energy conservation) at these facilities.

Project Objectives: Alternative Waste Management Technologies and Strategies would not implement many of the project objectives.

Finding: The proposed Alternative Waste Management Technologies and Strategies Alternative would not be able to eliminate the need for solid waste landfills and would therefore not be environmentally superior to the proposed project. Implementation of the proposed Alternative Waste Management Technologies and Strategies Alternative would not implement many of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the proposed Alternative Waste Management Technologies and Strategies Alternative described in the SEIR. The proposed Alternative Waste Management Technologies and Strategies Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the proposed Alternative Waste Management Technologies and Strategies Alternative, please see Sections 1.9.8, 5.2.6 and 5.9 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.7 REMOTE LANDFILL FACILITIES IN-STATE/OUT-OF-STATE

7.7.1 Eagle Mountain Landfill

Comparison of the Effects of the Proposed Eagle Mountain Landfill to the Effects of the Proposed Project:

1. The Eagle Mountain Landfill would be developed on a portion of the Kaiser Eagle Mountain Mine site. Kaiser owns portions of the project site, and the remainder of the site is owned by the U.S. Government and administered by the U.S. Department of the Interior, Bureau of Land Management (BLM). The project site is comprised of about $\pm 4,654$ acres of federal and patented lands. Under the Federal Land Policy and Management Act (FLPMA), about $\pm 3,481$ acres of BLM lands would be transferred to Kaiser in exchange for $\pm 2,846$ acres of land owned by Kaiser. The acquisition of BLM lands is necessary for the operation of the landfill, and the Kaiser lands contain desirable wildlife habitat on the Chuckwalla Bench. Also, a new FLMPA right-of-way would be issued for the entire length of the Eagle Mountain rail line, the existing Eagle Mountain Road, and the proposed Eagle Mountain Road Extension.
2. The potential landfill footprint encompasses $\pm 2,164$ acres, and the disposal capacity would be 708 million tons. At full-scale operations, the facility would have an intake rate of 20,000 tpd, derived from the Southern California region, and have a site life of 117 years, with a closure and postclosure maintenance period of 100 years. Approximately 16,000 tpd would be transported via the Southern Pacific Railroad system and an existing 52-mile, Kaiser-owned rail line that extends from Ferrum Junction to the Eagle Mountain Mine site. The remaining 4,000 tpd would be transported via transfer truck or enclosed waste-hauling vehicles. Waste transported to the project site, whether by train or transfer truck, would be transported in enclosed containers. The proposed project would be serviced by a network MRFs and transfer stations located in the Southern California area. The proposed landfill would be operational 7 days per week, 24 hours per day.
3. The proposed Eagle Mountain Landfill would create significant air quality impacts resulting from railhauling of wastes through numerous counties in the Southern California region (e.g., Los Angeles, Orange, San Bernardino, Riverside, San Diego, Ventura, and Santa Barbara Counties), create significant risk-of-upset conditions as a result of the transporting by rail wastes (up to 10 train trips daily) through multiple counties

and numerous jurisdictions, create significant risk-of-upset conditions due to train derailments and associated railhaul operations, increase risk-of-upset conditions on landfill workers resulting from the movement of heavy equipment and railhaul operations during nighttime operations, and generate significant traffic and circulation impacts as a result of operating four MRFs that would cumulatively process 20,000 tpd.

4. This alternative would generate impacts on surface water quality due to the amount of waste that could potentially affect the underlying aquifer in the Chuckwalla Valley Groundwater Basin; create substantial well water use that, in conjunction with the Eagle Mountain Energy Corporation hydroelectric project, would contribute to cumulative adverse impacts on the availability of groundwater in this area; create significant impacts on sensitive animal species, including the desert tortoise, Nelson's bighorn sheep, California leaf-nose bat, and Townsend's big-eared bat; and create impacts from vector attraction (ravens) on biological resources (desert tortoise).
5. The proposed Eagle Mountain Landfill project would generate noise impacts on local area residents within the Eagle Mountain town site due to nighttime landfill operations and railhaul operations, create visual impacts on the surrounding area from nighttime lighting sources during landfill operations and create impacts on wilderness recreation area users in the Joshua Tree National Monument, create migrating fugitive litter impacts on Joshua Tree National Monument, and create significant unavoidable impacts on the natural peace, solitude, clean air, and pristine desert environment as a result of project development. This alternative would create the direct loss of 50 million metric tons of recoverable iron reserves, and create demands on existing public service availability (fire and paramedic service) to service the project site.
6. In comparison to the proposed project, this alternative would result in a less significant land use impact due to its remote location away from heavily urbanized areas. However, other impacts associated with land use (e.g., its location next to a designated national park) would be significantly greater in comparison to the proposed project.

7. Development of this proposed alternative would create or generate greater environmental impacts than the proposed City/County Landfill. This alternative would not be environmentally superior to the proposed project.

Project Objectives: The proposed Eagle Mountain Landfill project would not implement many of the project objectives.

Finding: The proposed Eagle Mountain Landfill Project Alternative, overall, would result in greater impacts than the proposed project, and for that reason would not be environmentally superior to the proposed project. Implementation of the proposed Eagle Mountain Landfill Project Alternative would not implement the majority of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the proposed Eagle Mountain Landfill Project Alternative described in the SEIR. The proposed Eagle Mountain Landfill Project Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the proposed Eagle Mountain Landfill Project Alternative, please see Section 5.10.1 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.7.2 Railcycle-Bolo Station Landfill

Comparison of the Effects of the Proposed Railcycle-Bolo Station Landfill Project to the Effects of the Proposed Project:

1. The Railcycle-Bolo Station Landfill alternative is a private venture by Railcycle, a limited partnership between the Atchison, Topeka, and Santa Fe Railway Company, Inc. (ATSF) and Waste Management, Inc. Railcycle proposes to construct and operate a Class III landfill, accommodating an intake rate of 21,000 tpd and providing a net disposal capacity of 700 million tons.

Approximately 6,000 tons would be reserved for San Bernardino County use. The operational site life would be approximately 100 years.

2. This alternative would encompass 4,800 acres near Bristol Dry Lake, south of the Bristol and Marble Mountains. The project site is located midway between the communities of Cadiz and Amboy. Of the 4,800 acres, $\pm 2,100$ would be used for landfilling, while the remainder would be a buffer zone and support areas. The proposed landfill footprint would range from 370 to 380 feet above the surrounding natural terrain. Operations would be 7 days per week, 24 hours per day. This alternative will include right-of-way easements and land exchange with the BLM. Generally, wastes would be transported via rail systems from the Southern California region in sealed 40- to 45-foot containers. At the project site, containers would be offloaded and then transported a short distance to the landfill footprint for disposal.
3. This alternative has the potential to result in significantly greater impacts on earth resources due to landform alteration, substantial change in site topography, use of expansive and collapsible soils, and excavation and grading for cover materials. This alternative would require the excavation and grading of an undisturbed desert area that would use approximately 104 million cu. yd. of soil for daily, intermediate, and final cover material. The potential alteration of the topography and the establishment of an artificial mound on the flat desert surface would result in significant aesthetic and visual impacts.
4. The implementation of this alternative would result in significant impacts on air quality due to the amount of emissions generated to transport waste by rail from several counties in the Southern California region to the project site. Currently, the air basin is in nonattainment for NO_x and ROGs. The development of this project would create substantial impacts on water resources because increased water demands on the Bristol Groundwater Basin would result. This basin is currently in overdraft and is of regional importance. In addition, this alternative would result in impacts from site development within a floodplain where drainage currently exists as overland sheetflow. This alternative would create transportation and circulation impacts associated with the regional transport of wastes through multiple

counties and jurisdictions (up to seven train trips daily) and increased risks and delay times on vehicles traveling over railroad crossings. Risk-of-upset conditions would occur associated with the potential for train derailments.

5. The proposed Railcycle-Bolo Station Landfill project would result in impacts from vector attraction (ravens) on biological resources (desert tortoise); direct impacts on plant species, including 690 acres of creosote bush scrub habitat, 1,130 acres of creosote bush all-scale scrub habitat, 480 acres of desert dune scrub habitat, 50 acres of desert saltbush scrub habitat, and 50 acres of desert wash scrub habitat.
6. Implementation of this alternative would result in increased risks to landfill workers associated with nighttime operations due to heavy machinery operations. This project would result in greater impacts on fire and paramedic services due to the current unavailability of these services at the site. Impacts on natural resources would be greater with the proposed Railcycle-Bolo Station Landfill project associated with the direct loss in 5,000 to 10,000 tons per year of calcium chloride and sodium chloride. Impacts on paleontological resources would occur due to the abundance of specimens, diversity of specimens represented, and assemblage of the regional area. Visual impact on the surrounding area would occur due to nighttime lighting for landfiling operations. The project would create an inconsistency with the scenic resource goals of the Open Space Element of the County of San Bernardino General Plan by creating a landfill that would be elevated 370 to 380 feet above the desert floor, causing aesthetic and visual impacts.
7. The Railcycle-Bolo Station Landfill Alternative would result in fewer impacts on land use due to its remote location.
8. Development of this alternative has the potential to create greater environmental impacts than the proposed City/County Landfill project. Moreover, this alternative would not be environmentally superior to the proposed project. In addition, the project proponent does not own or maintain control over this subject site. This alternative does not meet many of objectives of the proposed City/County Landfill because it would not allow additional disposal capacity in-County, effectively use

locally available waste landfills, or provide funding for waste planning, enforcement, and monitoring programs.

Project Objectives: The proposed Railcycle-Bolo Station Landfill project would not implement many of the project objectives.

Finding: The proposed Railcycle-Bolo Station Landfill Project Alternative, overall, would result in greater impacts than the proposed project, and for that reason would not be environmentally superior to the proposed project. Implementation of the proposed Railcycle-Bolo Station Landfill Project Alternative would not implement the majority of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the proposed Railcycle-Bolo Station Landfill Project Alternative described in the SEIR. The proposed Railcycle-Bolo Station Landfill Project Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the proposed Railcycle-Bolo Station Landfill Project Alternative, please see Section 5.10.2 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.7.3 Mesquite Regional Landfill

Comparison of the Effects of the Approved Mesquite Regional Landfill Project to the Effects of the Proposed Project:

1. This is an approved regional Class III nonhazardous landfill, located adjacent to an active Mesquite Gold Mine and Ore Processing Facility in eastern Imperial County. The project proponent is California RailFill Systems, consisting of USA Waste Services, Gold Fields Mining Corporation and its subsidiary Arid Operations (landfill operator), and Union Pacific Railroad and its subsidiary Southern Pacific Environmental Systems.
2. The Mesquite Regional Landfill project site encompasses

±4,250 acres of private and public land. Approximately 1,750 acres of BLM land would be exchanged; in addition, a 4- to 5-mile rail spur would need to be constructed on BLM-owned land. The landfill footprint encompasses ±2,290 acres and would provide an estimated 600 million tons in airspace capacity over 100 years. This landfill would be above grade and range from 375 to 475 feet above the desert floor. Operations would be 7 days week/24 hours per day. The estimated daily municipal solid waste residue volumes at the landfill would be 4,000 tpd, increasing to a maximum tonnage of 20,000 tpd after the seventh year.

3. This approved alternative has the potential to create significant impacts on earth resources due to landform alteration, changes in site topography, extensive excavation and grading for daily cover materials, and the construction of a 4- to 5-mile railroad spur, extending from the Southern Pacific Transportation Company mainline track to the project site. In addition, the project would result in impacts associated with the excavation and grading of an undisturbed desert area that would require 200 million cu. yd. of soil for daily, intermediate, and final cover material.
4. Potential air emissions associated with development and operation would be regionally significant. This alternative would use processed ore for intermediate and final cover, and the potential exists for trace amounts of cyanide and other materials remaining in that cover material to create potential impacts on water quality. The project site is located above the Amos-Ogilby Groundwater Basin, a regionally important groundwater resource, and potential contamination impacts on this groundwater basin by the landfill would be significant. The project site is underlain by gold ore, and minor amounts of silver ore are found disseminated in microfractures of gneiss and granitic basement rock; therefore, impacts on natural resources would occur as a result of project development.
5. This alternative is expected to result in a cumulative loss of ±3,657 acres of desert tortoise habitat. Additionally, project development has the potential to eliminate onsite biological habitats that support the ferruginous hawk and the loggerhead shrike, which are Category 2 candidate species. In addition, the project would have the potential to result in vector attraction

(ravens) on biological resources (desert tortoise). The development of this landfill would result in significant light and glare impacts due to night lighting and the illumination of the desert sky. The use of night lighting on the project site could interfere with driver visibility and military pilots using night vision devices. Potential risk-of-upset impacts include the possibility of train derailments associated with railhaul operations. In addition, the project would result in increased risks on landfill workers from heavy equipment operated during nighttime operations.

6. The project is expected to generate significant traffic impacts from employee-generated trips during weekend periods from October 1 to May 31 on SR-78 because of the existing service conditions (LOS "F") from recreational travelers along this route. Noise impacts on sensitive land uses adjacent to SR-78 would be significant. The landfill footprint would dominate the existing natural environment, creating a strong degree of contrast between the landfill and the surrounding desert landscape, and would result in an unavoidable significant adverse impact on the natural viewshed. In addition, litter generation would occur within a scenic environment. The project would result in the loss of the Mesquite Mine Overlook Trail. Development of the project site would disturb 10 cultural resource sites that are currently eligible for inclusion on the National Register of Historic Places.
7. Traffic impacts from the approved Mesquite Regional Landfill project would be associated with the operation of at least four future MRFs/transfer stations that would cumulatively process up to 20,000 tpd. In addition, the project would result in increased risks and delay times to vehicles waiting at railroad crossings.
8. This alternative would result in fewer land use impacts than the proposed project due to its remote location.
9. The Mesquite Regional Landfill Alternative does not meet many of the objectives of the proposed City/County Landfill project because its implementation would not create an efficient and cost-effective waste disposal system for the City or County. This alternative would not be environmentally superior to the proposed project. In addition, the project proponent does not own or control this subject site.

Project Objectives: The approved Mesquite Regional Landfill project would not implement many of the project objectives.

Finding: The approved Mesquite Regional Landfill Project Alternative, overall, would result in greater impacts than the proposed project, and for that reason would not be environmentally superior to the proposed project. Implementation of the approved Mesquite Regional Landfill Project Alternative would not implement the majority of the project objectives. It is found pursuant to Public Resources Code § 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including the considerations identified in Section 9 of these CEQA Findings (Statement of Overriding Considerations), make infeasible the approved Mesquite Regional Landfill Project Alternative described in the SEIR. The approved Mesquite Regional Landfill Project Alternative would not be environmentally superior to the proposed project and it would not implement many of the project's development and solid waste objectives. Therefore, the City finds that this alternative is infeasible and less desirable than the proposed project and rejects this alternative for the reasons stated above.

Reference: For a complete discussion of impacts relating to the approved Mesquite Regional Landfill Project Alternative, please see Section 5.10.3 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

7.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Comparison of the Effects of the Immediate Combined City/County Landfill Operations Alternative to the Proposed Project: The Immediate Combined City/County Landfill Operations Alternative is environmentally superior to the proposed project.

1. The environmentally superior alternative results in the greatest reduction of significant effects on the environment when compared to the other alternatives for the proposed project. The environmentally superior alternative to the proposed project is the No Project Alternative. The No Project Alternative assumes that the proposed project would not be implemented, thereby precluding development of the combined City/County Landfill in Sunshine Canyon with a net disposal capacity

of 90 million tons. The existing 17-million-ton County Landfill would continue to operate, accepting an average of 6,000 tpd of waste. Its operational site life is anticipated to be exhausted in approximately 10 years, based on an intake rate of 6,000 tpd. If the No Project Alternative is approved, the project proponent would pursue future project entitlements pursuant to existing County Landfill CUP conditions to expand landfill development in the upper reaches of the County portion of Sunshine Canyon. Potential development could result in the expansion of County Landfill, which would provide a net disposal capacity of 70 million tons.

2. The project site in the City would retain its existing land use designation of "Open Space" and its zoning designation of "A1-1-0." In accordance with that designation, the following uses would be permitted by right under the corresponding "A1" zone (i.e., agricultural zone): single-family dwellings, community parks, golf courses, and extensive agricultural uses. Development of these uses would not be pursued by the project proponent in the foreseeable future because of the existing inactive landfill facility in the City, mandated to undergo a 30-year closure and postclosure period. Because operations at the inactive landfill and County Landfill are industrial in nature, they have the potential to create impacts on public health, safety, and the environment. Allowing public access onto private property for active or passive recreational activities during these operations may result in unnecessary liabilities by the project proponent and potentially interfere with the maintenance of postclosure systems at the inactive landfill.
3. The No Project Alternative would avoid site-specific environmental impacts resulting from the development of the City/County Landfill Project, such as earth, hydrology and water quality, noise, land use, risk of upset, transportation and circulation, public services, utilities, aesthetics, and cultural resources. Therefore, on a site-specific basis only, the No Project Alternative is environmentally superior to the proposed project.
4. The No Project Alternative would not be environmentally superior to the proposed project on a regional basis. Implementation of the No Project Alternative would result in the development of new solid waste landfills that

would result in far more significant environmental impacts than the proposed project. The City/County Landfill project would be a landfill expansion that would occur on a site that is predominantly degraded due to previous landfill operations in the City portion of Sunshine Canyon and existing landfill operations in the County portion of Sunshine Canyon.

5. Pursuant to State CEQA Guidelines, § 15126, subd. (d)(4), "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." In that regard, the next environmentally superior alternative is the Immediate Combined City/County Landfill Operations Alternative. Under this alternative, project development would result in joint City and County landfiling operations commencing immediately on one landfill footprint in Sunshine Canyon. Similar to the proposed project, this alternative would have a landfill footprint configuration encompassing ±451 acres, which would include ±194 acres in the City and ±42 acres in the County, and connect with the operational ±215 acre County Landfill, providing a net disposal capacity of 90 million tons.
6. However, unlike the proposed project, landfiling operations under this alternative would be performed at a single working face area immediately upon commencement of landfill operations rather than occurring at two separate working face areas during the first 18 to 24 months. Approximately 11,000 tpd of waste would be received at this facility. The anticipated site life of this alternative is the same as the proposed project (approximately 26 years). The Immediate Combined City/County Landfill Operations Alternative would reduce impacts on air quality, worker safety, and fire and emergency services during the first 18 to 24 months.
7. The Reduced Volume Alternative would not be environmentally superior to the proposed project. In comparison to the City/County Landfill project, a smaller landfill footprint would be developed (±44 acres versus ±451 acres). The Reduced Volume Alternative would provide an average waste intake of 5,000 tpd, having an estimated net disposal capacity of approximately 8 million tons in comparison to 90 million tons of capacity for the proposed project. The reduced capacity would result in an operational site life of approximately 5

years in comparison to an expected 26-year operational site life for the proposed project. The Reduced Volume Alternative would require approximately 2.8 million cu. yd. of daily, intermediate, and final cover material in comparison to 25.49 million cu. yd. for the proposed project.

8. The Reduced Volume Alternative landfill footprint would include land that has been disturbed or degraded due to prior landfilling activities in the canyon, avoiding development in sensitive plant communities and streambed areas of the canyon. This alternative landfill footprint would overlies small portions of the existing inactive landfill. If the Reduced Volume Alternative is approved, the County Landfill would continue to operate independently, even though both landfill footprints would eventually connect with one another. The environmental control systems would be separate from the County Landfill. Ancillary uses such as the access road, scales, and administrative offices would be shared.
9. In evaluating this alternative, impacts on hydrology and water quality, noise, and risk-of-upset would be similar to the proposed project because they have the same short-term characteristics. The Reduced Volume Alternative would reduce both mid- and long-term site-specific impacts on the environment due to a shortened site life; therefore, environmental effects would be substantially lessened.
10. In comparison with the proposed project, and on a site-specific basis only, this alternative would be environmentally superior to the proposed project. However, due to a shortened site life, regional impacts would be significant because the waste stream would be transferred to other landfill facilities within, or outside of, the region after a 5-year period. For that reason, regional significant impacts would occur since the burden of providing additional landfill disposal capacity would be placed on more distant in-County/out-of-County landfill facilities or remote landfill locations.

Reference: For a complete discussion of the Environmentally Superior Alternative, please see Sections 1.9.10 and 5.11 of the Draft SEIR, and Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein.

8.0 FINDINGS REGARDING THE MITIGATION REPORTING AND MONITORING PROGRAM AND OTHER CEQA CONSIDERATIONS

8.1 MITIGATION REPORTING AND MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a public agency making findings to adopt a reporting or monitoring program for the changes to the project that it has adopted or make a condition of project approval in order to mitigate or avoid significant effects on the environment. The City hereby finds that the Mitigation Reporting and Monitoring Program (MRMP), as adopted by the City for the proposed project, meets the requirements of Section 21081.6 of the Public Resources Code.

8.2 IRREVERSIBLE ENVIRONMENTAL CHANGES

There would be an irreversible and irretrievable commitment of the resources necessary to construct and operate the landfill, including the consumption of fossil fuels for heavy-duty construction equipment, vehicles used during construction (short term), operational activities (long term), and transporting refuse to the landfill by transfer trucks, collection vehicles, or other vehicles. Lesser contributors to this consumption include employee-generated traffic and the offsite generation of electrical power.

The proposed City/County Landfill Project would irreversibly change the landform within Sunshine Canyon. Development of the landfill: would remove existing wetland and riparian habitats and related animal species, thereby irreversibly affecting these resources located within the proposed development area; would result in residual air quality impacts, which are expected to remain significant within the SCAB even with the implementation of mitigation measures; and would create the potential of irretrievably disposing of materials that could otherwise be recycled, thereby resulting in an increased consumption of virgin materials. The landfill's development would commit the property to an industrialized/urbanized use and those resources located thereon for a 26-year operational period and a 30-year postclosure maintenance period.

8.3 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Development of the City/County landfill is not considered to be growth-inducing. Development of the landfill would not directly result in economic, population, or housing growth in the immediate project area, since its presence, and the presence of the existing inactive City landfill and the operational County Landfill located

within the project site, would preclude the use of the site for residential use. The landfill has the potential to indirectly create beneficial impacts by stimulating economic growth, creating short-term construction jobs, and providing long-term, full-time employment opportunities to individuals within the Los Angeles region. In addition, the landfill would provide needed long-term waste disposal capacity for waste generated in the region. In accordance with City- and County-adopted long-range solid waste management plans, landfills are necessary to accommodate both existing and future disposal capacity needs of commercial, industrial, and residential developments throughout the region.

The landfill's development and operation would preserve necessary in-County disposal capacity within the Los Angeles region, provide control over the management of landfill capacity, provide access for residents within the region, establish compliance with environmental standards and regulations, and support goals and policies established by the City and County. The proposed project does not include any actions or provide any infrastructure improvements that would remove obstacles to population growth. No known characteristics are associated with the proposed project that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. A population's waste disposal needs are not restricted by the availability of local landfills, unlike sewer and water needs that are restricted by the availability of in-place sewer and water lines.

9.0 FINDINGS REGARDING THE STATEMENT OF OVERRIDING CONSIDERATIONS

Statement of Overriding Considerations: This section of the findings addresses the requirements in Section 15093 of the State CEQA Guidelines that requires the City, in its role as Lead Agency under CEQA, to balance the benefits of a project against its unavoidable significant impacts to determine whether the impacts are acceptably overridden by the project's anticipated benefits.

The Final SEIR identified and discussed significant effects that would occur as a result of proposed project development. With the implementation of the mitigation measures discussed in the Final SEIR, these effects can be mitigated to a level of less than significant, except for unavoidable significant impacts on air quality, as identified in Section 6.0.

As defined by the SCAQMD CEQA Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants (i.e., nitrogen oxides [NO_x], reactive organic gases [ROG], and suspended particulate matter [PM₁₀]) due to project implementation. Regional emissions of all criteria pollutants (i.e., carbon monoxide [CO], NO_x, ROG, sulfur oxides [SO_x], and PM₁₀) will decrease by reduced mileage traveled within the South Coast Air Basin. Emission levels for CO and SO_x are projected to remain below their applicable threshold levels. Furthermore, CO emissions are not projected to exceed either State or federal ambient air quality standards or create "hot spots."

The identified air quality impacts relate predominantly to necessary construction and operational aspects of the landfill project and/or the cumulative development of related projects in conjunction with the proposed project, and based on the effects resulting from operations of heavy equipment for site construction, trucks that utilize the project site, and refuse trucks accessing the project site. Feasible mitigation measures and control efficiencies for each dust-generating and other operation, paved roads, unpaved roads, heavy operating equipment, site erosion, have been included and required in the project to mitigate air quality impacts to the extent feasible.

The identified mitigation measures made conditions of the project would substantially reduce impacts; however, even with their implementation, project-generated and project-related cumulative air quality impacts are considered significant and unavoidable, given the nature of the project. These impacts relate predominantly to operational aspects of the City/County Landfill and/or the cumulative development of related projects in conjunction with the proposed project. These unavoidable impacts cannot be alleviated even with a reduced volume capacity or other design modifications that would be economically infeasible and/or would still result in significant environmental impacts on air quality. Therefore, project implementation is being proposed for the following reasons:

Comply with comprehensive, long term plans of the City and County of Los Angeles.

Provide an immediate solution to a potential future crisis in managing the City's solid waste.

Comply with the State of California mandated requirements of AB 939 to provide a minimum 15 years of solid waste disposal capacity.

Provide a landfill within proximity to City generated waste streams.

Provide a landfill facility with local control over that facility.

Minimize significant environmental impacts that would occur elsewhere as a result of developing new landfill sites or imposing longer transportation distances to remote facilities.

Use of land that has been disturbed by previous landfill activities and locate a future landfill use adjacent to a currently operating landfill in Los Angeles County.

CEQA allows agencies to balance the benefits of a proposed project against its significant unavoidable adverse impacts in determining whether to approve or conditionally approve a pending project. If the benefits of the project outweigh the significant unavoidable adverse impacts, the adverse impacts may be considered "acceptable" by the Lead Agency. Where the decision of the Lead Agency allows the occurrence of significant adverse effects as identified in the EIR, the Lead Agency is required to adopt a Statement of Overriding Considerations, which documents through findings the specific reasons/rationale for project approval based on the information presented in the project's administrative record. The City, therefore, finds that the significant environmental impacts relating to air quality identified in the Final SEIR may continue to exist as a result of the construction and/or operation of the proposed project, because the benefits of the proposed project outweigh the potential unavoidable adverse impacts, and the unavoidable adverse impacts are acceptable based on the following overriding considerations:

Public Benefits. The project would provide the following the following public benefits:

1. develop a solid waste landfill on privately owned land within the City and County jurisdictions that is primarily disturbed due to extensive landfilling operations that have taken place over a 30-year period;
2. develop a landfill footprint within the City to connect with land area in the County (±42 acres) and to the operational County Landfill, thus providing combined landfilling operations at a single landfill footprint in Sunshine Canyon;

3. perform landfilling operations within a single landfilling area in either jurisdiction using a cut-and-cover fill method for landfilling;
4. develop a solid waste landfill that would meet environmental, health, and safety goals, and exceed regulatory standards and requirements during landfilling construction, operation, and closure;
5. develop a solid waste landfill that would allow for reduced costs of operation and therefore reduced consumer costs by using existing onsite infrastructure improvements, including utilities, an improved site entrance for ingress/egress of traffic, an onsite access road, improved scale facilities and check-in area (for weighing and accounting for the wastes to be deposited), surface drainage improvements, and other environmental protection and control systems;
6. effectively use existing transfer station/MRFs, solid waste collection company services, and other related facilities in the Los Angeles region to support the operation of the proposed City/County Landfill;
7. generate 35 new full-time jobs within Los Angeles County at the project site and provide short-term construction jobs during each sequence of landfill development;
8. provide cost-effective, short-, mid-, and long-term solid waste disposal capacity at the project site for residences and businesses within the City of Los Angeles and the Los Angeles region;
9. provide efficient solid waste management and disposal capacity to the City and County by developing a landfill facility to avert an identified short-term and potential future long-term solid waste disposal capacity shortfall;
10. provide both City and County jurisdictions the opportunity for long-term solid waste disposal capacity;
11. recover, recycle, and/or reuse waste materials that would otherwise be disposed of at the City/County Landfill by providing a green waste/wood waste recycling area for local residents;
12. minimize impacts on air quality within the SCAB by providing additional disposal capacity within the Los

Angeles region, thereby reducing emissions from transporting refuse longer distances;

13. provide cost-effective disposal options for the City, County, and private haulers at a landfill facility within the region to minimize transportation costs;
14. minimize significant impacts on environmental resources associated with the development of new landfill sites (i.e., proposed sites located within undisturbed canyon areas or remote desert locations) by using areas of the existing inactive landfill and other areas within Sunshine Canyon that are primarily disturbed and that have infrastructure in place to readily accommodate future development; and
15. facilitate local and regional efforts directed toward attaining solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the *City of Los Angeles Source Reduction and Recycling Element* (City SRRE), the *City of Los Angeles Solid Waste Management Policy Plan* (CiSWMPP), the County and City Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, the *Los Angeles County Countywide Siting Element* (CSE), the *County of Los Angeles Source Reduction and Recycling Element* (County SRRE), and formally executed agreements between the County and the City that identify the need for the maximum technically and environmentally feasible expansion of landfill sites.

HEARING EXAMINER REPORT

- Section No. 4

HEARING EXAMINER REPORT

BACKGROUND, COMMENTS, AND RECOMMENDATIONS

BACKGROUND

Requests and Modifications

The requests are for **amendments** to the Granada Hills-Knollwood Community Plan from the "Open Space" to "Heavy Industrial" designation, amendments to other applicable elements of the general Plan, and a **zone change** from A1-1-K-0 (Agricultural, Height District 1, Equine Keeping), Oil Drilling Overlay District) to M3-1 (Heavy Industrial, Height District 1).

The applicant's original request was **first modified** to eliminate approximately 100-acres from the amendments and zone change. The purpose of the modification is to maintain the Open Space designation and A-1-K-0 zone classification on the 100 acres in order to provide a natural buffer between the landfill and the residential community to the south.

The applicant requested a **second modification** for a general plan amendment and zone change to an Added Area. After the public hearing, it was noticed that an area of approximately 5 acres (see Exhibit No. E-3) has a less restrictive zone classification than the proposed M3 on the subject site. The purpose of the second modification is to amend the general plan designation of the Added Area from Open Space to Heavy Industrial to avoid creating an island of the most restrictive land use designation surrounded by the least restrictive Community Plan designation.

Pursuant to the Los Angeles Municipal Code §§ 11.5.6 and 11.5.8, the request to amend the general plan designation for the Added Area has been set for public hearing on February 25, 1999 before the Planning Commission. Notice of the time, place, and purpose of the hearing was given by publication in Metropolitan News-Enterprise newspaper ten days prior to the hearing. In addition to the legal notice in one newspaper of general circulation, notices were mailed to approximately 300 individuals listed on the interested parties list.

The Proposed Project

The proposed project is the development, operation, maintenance and monitoring of a Class III, non-hazardous solid waste landfill on a 494-acre site in Sunshine Canyon of which approximately 100 acres

will be a natural buffer. The proposed project includes several structures and uses that will be relocated from the County landfill to the City landfill consisting of a scale house, scale facilities, administrative offices, a caretaker facility, a lunchroom/locker storage facility, maintenance and control buildings, a leachate treatment plant and storage tanks. New construction will consist of surface drainage systems, water storage tanks, gas monitoring stations, gas flare station and other ancillary uses.

The footprint, waste disposal area, of the proposed landfill within the City would consist of approximately 194 acres and would provide an estimated net airspace disposal capacity of 55 million tons, and a total of 90 million when connected with the currently operating County Landfill by means of the proposed 42-acre extension within the County. The joint operation of the City/County Landfill would allow for an average waste intake of 11,000 tons per day (tpd) (5,000 tpd in the City in addition to the currently authorized 6,000 tpd in the County), with a daily maximum of 12,100 tons. This total includes an average of 1,100 tpd of inert waste or peak volume disposed waste.

The proposed hours of operation are 6:00 a.m. (Scales open) to 6:00 p.m. (Scales close), Monday through Friday, and 7:00 a.m. to 2:00 p.m. on Saturday. The landfill entrance gate at San Fernando Road will open at 5:00 a.m. on weekdays and 6:00 a.m. on Saturday to allow the onsite queuing of vehicles. Refuse cover, maintenance and related operations will be completed by 9:00 p.m. on weekdays and Saturday.

Additional Relevant Entitlements

Closure and Post-Closure Plans

BFI, in coordination with the City Local Enforcement Agency (LEA), has been processing its closure and post-closure maintenance plans to authorize specific maintenance and monitoring activities to occur at the inactive City Landfill. Final closure of the landfill is regulated by the California Integrated Waste Management Board (CIWMB) regulations (Title 27, California Code of Regulations) which require the maintenance and monitoring of a closed landfill for a 30 year period to ensure that leachate, methane gas, dust, drainage and erosion controls are sufficiently maintained and that other landfill design performance standards are being met. At the end of the 30 year post-closure maintenance period, the CIWMB, the Regional Water Quality Control Board, and the City LEA, must determine that the site poses no threat to public health and safety or to the environment before the post-closure maintenance period can be terminated and new uses can be established.

County Administrative Approval for 42 Acres

If the City grants the applicant's requests, the applicant will request the County for a non-discretionary review of the 42 acres that will connect the City and County landfills. (See Draft SEIR pp. 2-37 to 2-43)

County Discretionary Action for Expansion of the County Landfill.

If the City does not grant the applicant's request, the applicant may ask the County for a discretionary review of expanding the existing County landfill to 70 million tons (including the 17 million tons) of capacity from the currently approved 17 million tons. The 70 million option has a certified Final EIR. (See County CUP and Oak Tree Permit 86-312-(5))

Joint Powers Agreement or Other Instrument

The proposed project requires separate approvals and entitlements from the County and City. In the Draft SEIR (See pg. 2-38), the applicants stated their desire to have a joint working agreement between the City and County. They would like the City and County to enter into some form of agreement regarding the exercise of Local Enforcement Agency (LEA) authority over the entire project site for the daily monitoring of operations in a manner that would recognize and maintain existing discretionary approvals, permitting requirements, regulatory obligations, contractual agreements, and other arrangements that were approved by the City, County, and other regulatory agencies. The combined development of land within both jurisdictions would result in one landfill footprint being constructed in Sunshine Canyon, with a waste disposal capacity of approximately 90 million tons.

Subject Property

The irregularly shaped subject site is a 494-acre portion of Sunshine Canyon, located at 14747 San Fernando Road. It is approximately $\frac{3}{4}$ mile southwest of the intersection of the Golden State Freeway (I-5) and Antelope Valley Freeway (SR-14) multilevel freeway interchange.

Surrounding Land Use and Zoning

The project site is surrounded by unincorporated areas of the County to the north and west and the communities of Granada Hills and Sylmar located to the south and east, respectively.

Surrounding land uses within a 1-mile radius of the project site consist of undeveloped mountainous terrain in the County, a gun club, worm farm, and horse stables to the north and west; oil fields to the west and southwest. In addition, the Rice Canyon and Tunnel Area districts of the Newhall Oil Field are located near the western and northern boundaries of the County portion of the project site, respectively; by O'Melveny Park, Bee Canyon, and single-family residential uses to the south; and to the east three freeway corridors: the I-5 Freeway, directly east of the landfill entrance; the SR-14 Freeway, to the northeast; and the I-210 Freeway. The Los Angeles Aqueduct Filtration Plant and Metropolitan Water District Joseph E. Jensen Filtration Plant boundaries are located approximately ½ mile south of the landfill entrance. The Jensen Plant is adjacent to the terminus of the Los Angeles Aqueduct, across the I-5 freeway. The Los Angeles Aqueduct is the primary source of water supply to the City, delivering water from the eastern Sierra Nevada runoff and Owens Valley groundwater.

The nearest school to the project site is Van Gogh Street Elementary (approximately 1¼ miles south from the landfill entrance and 0.7 mile from the nearest project boundary). In addition to Van Gogh Elementary, one elementary school, one middle school, and one high school are in the vicinity.

NORTH: Surrounding properties are generally located downgradient and at elevations well below the project site's ridgelines. Adjoining properties to the north consist of undeveloped mountainous terrain within the County where the topography descends to about 1,000 feet Mean Sea level (MSL) near the I-5 Freeway at Weldon Canyon. Abutting the site on the northeast is an unimproved 5-acre, landlocked residential subdivision recorded in 1927, designated Open Space and zoned A1-1 (Added Area).

SOUTH Abutting properties on the southeast are designated Open Space and Minimum Residential and zoned A1-1-K-0 and improved with a large single-family dwelling, an unimproved parcel owned and utilized by St. Vincent De Paul Summer Camp, and a single-family housing tract designated Low Residential and zoned RS-1-0. These uses are located southward of an intervening ridgeline that ranges in elevation from 2,150 to 1,425 feet MSL, and a 100 acre Open Space area.

Adjoining properties along the southwest side are two existing City park sites designated Open Space and zoned OS-1-XL. O'Melveny Park is a regional public recreation site and encompasses 695 acres. Ridges and canyons are

located southwest of the site within the O'Melveny Park area. The highest peak and one of the most prominent features in this area is Mission Point at 2,771 feet MSL. Bee Canyon Park is a ±2 acre community park located directly southeast of O'Melveny Park. The closest existing trail to the project site is a 3-mile trail located along the ridgetops of O'Melveny Park.

EAST

Adjoining properties to the east are designated and zoned Public Facilities, Height District No. 1 and consist of vacant land adjoining the Golden State (I-5) Freeway. Properties located across from the landfill entrance and San Fernando Road are zoned RMP-1 and contain six trailers, a wood chipping and fire wood area, and a light industrial area consisting of several equipment storage buildings. In addition, the Metropolitan Transportation Authority (MTA) owns the rail track and right-of-way (ROW) located approximately 250 feet east of the landfill entrance. Southern California Regional Rail Authority (SCRRA) maintains these tracks and operates the Metrolink regional commuter train service (i.e., Santa Clarita Line) into the Los Angeles area. The adjoining properties to the southeast are designated Open Space and zoned A1-1-0 and are unimproved.

WEST

Adjoining property on the northwest consists of the County Landfill area including the East Canyon dedication area. Prior to the County Landfill operation, over ±426 acres in East Canyon were dedicated to the County for open space and recreational purposes. It is anticipated that horseback riding and hiking trails will be provided in East Canyon. These trails would eventually link to other proposed trail systems in the area.

Street Classification

Regional: Regional access to the project site for waste hauling vehicles is provided via the following freeway systems: Antelope Valley (SR-14), Foothill (I-210), Simi Valley-San Fernando Valley (SR-118), Golden State (I-5), and San Diego (I-405) Freeways. The I-5 Freeway has a northwest-southeast trending alignment and is located directly east of the project site. The SR-14 Freeway extends north from the I-5 Freeway to the cities of Palmdale and Lancaster. The intersection of the I-5 and SR-14 Freeways is located approximately ½ mile from the project site entrance. Access for both the I-5 and the SR-14 Freeways is provided north of the project site via a

southbound offramp at San Fernando Road, and a northbound onramp at Foothill Boulevard. Southeast of the project, access to the I-5 Freeway is provided at Roxford Street.

Approximately 3 miles southeast of the landfill, the I-405 Freeway connects with the I-5 Freeway. The I-210 Freeway extends east from the I-5 Freeway. The I-210 Freeway access closest to the project is located at Yarnell Street, approximately 1½ miles southeast of the site. The SR-118 Freeway is located approximately 3 miles south of the project site and extends in a westerly direction from the I-210 Freeway.

Local: The local circulation system moves traffic between adjacent communities and various parts of the City and County, and distributes traffic from the local freeway systems to various destinations within the City and County. The City's local street network is classified into one of three categories: major highways, secondary highways, and collector streets. The hierarchy of street types is relative to the volume of traffic movement they are designed to handle. (See below) Furthermore, traffic movement is affected by the following factors: the degree of access to adjacent properties, allowable adjacent land uses, the amount of visual distraction to the driver, slope of the roadway, and visibility from the roadway.

Specific Streets: The following street categories are based on the City's hierarchy of street types and standards for minimum right-of-way (ROW) and curb-to-curb pavement width. Immediate ingress to and egress from the project site are provided via San Fernando Road. Project-generated traffic is expected to use the following local area roadways in proximity to the site: Sepulveda Boulevard, Roxford Street, Balboa Boulevard (limited use only due to a vehicle weight limitation), Foothill Boulevard, and Yarnell Street. Most of these roadways are classified by Los Angeles Department of Transportation as "Major Highway," except Yarnell Street, which is classified as a "Secondary Highway" as defined below.

Major Highways. The main function of a major highway is to move large volumes of traffic from one part of the City to another and to conduct locally destined traffic from the freeway system. Major highways typically have the following characteristics: 20 feet of sidewalk width, 80 to 84 feet of pavement width, and 100 to 104 feet of total Right-of-Way.

Secondary Highways. The main function of a secondary highway is to conduct traffic from local residential streets or industrial areas to arterial streets or to traffic generators such as local shopping centers, schools, or parks. Secondary highways do not carry traffic from one part of the City to another. Secondary highways typically have the following characteristics: 20 feet of sidewalk width, 66 feet of pavement width, and 86 feet of total ROW.

Collector Streets. The main function of a collector street is to provide access to property abutting the Right-of-Way, including both vehicular and pedestrian access. In the majority of instances, collector streets generally serve abutting residential uses, but they may also serve commercial and industrial land uses as well. Collector streets typically have the following characteristics: 20 feet of sidewalk width, 44 feet of pavement width, and 64 feet of total Right-of-Way.

Previous Relevant Entitlements (Refer to the Draft SEIR pp 1-5 to 1-6)

Reports Received

Attachment No. A-2 - City of Los Angeles, Bureau of Sanitation, January 26, 1999; RE: City of Los Angeles Refuse Disposal Options.

Environmental Status

In November 1993, the County of Los Angeles granted a conditional use permit and other approvals for landfilling in the County portion of Sunshine Canyon ("County Landfill"). In connection with the 1993 approval, the County certified a Final EIR. The County Landfill opened in August of 1996.

On June 25, 1991, the project proponent filed applications with the City of Los Angeles for a general plan amendment and zone change for a proposed City Landfill Project. On August 7, 1991, the Environmental Staff Advisory Committee determined that a Supplemental EIR should be prepared to address the potential environmental effects of the proposed City Landfill Project. It was later determined by City Planning staff that a Subsequent Environmental Impact Report ("SEIR") should be prepared because of substantial changes and/or revisions to the proposed project.

Subsequently, the project proponent eliminated those components from the project and prepared a Draft SEIR.

The Draft SEIR is intended to use prior environmental information and build upon the previously certified County FEIR prepared for the County Landfill. The following CEQA documents were prepared for the proposed City Landfill:

Draft Subsequent EIR, Volume I, July 1997
Draft Subsequent EIR - Appendices, Volume I, July 1997
Final Subsequent EIR, Volume I, June 1998
Final Subsequent EIR - Appendices, Volume II, June 1998
Addendum, February 5, 1998 (Added Area)

A discussion of the environmental process and a brief summary of each of these documents is provided below.

The Environmental Process

Pre-circulation¹

Environmental issues were initially identified by the City Planning staff in the Initial Study and Checklist (refer to Volume II, Appendix A3, of the Draft SEIR). A 30-day pre-draft circulation period was initiated by the Department of City Planning. During that review period (i.e., April 11 through May 11, 1992), Responsible Agencies and interested parties were encouraged to submit comments on the proposed City Landfill Project.

At the request of City staff, the Notice of Preparation ("NOP") of the proposed project was sent to over 10,000 property owners located within a 2-mile radius of the project site. In addition, approximately 170 interested parties (e.g., internal City departments, adjacent cities/counties, and Responsible Agencies) received a copy of the NOP/Initial Study by certified mail

¹ Environmental issues and concerns raised by commentators during the pre-draft circulation period on the NOP/Initial Study are included in the Draft SEIR Volume II, Appendix A7. Also, refer to the Draft SEIR Volume II, Appendices A6 and A13. Also, see Attachment No. 1 in the City Planning Commission transmittal.

Public Scoping Meeting ^{2 3}

A public scoping meeting, coordinated by City Planning staff and facilitated by an independent consultant, was held on April 29, 1992, at John F. Kennedy High School in Granada Hills, California. The intent of the meeting was to describe the proposed project, define the environmental review process, and solicit input from the general public concerning relevant environmental issues.

The following issues were raised during the Scoping Meeting: human health/risk of upset, air quality, winds, alternatives to the proposed project, earth (seismicity), water quality (specifically the effect of the proposed project on the Los Angeles Reservoir), BFI's past operational compliance record, and a procedural question regarding the type of EIR being prepared (project level v.s. Supplemental EIR). Refer to Appendix A10 of the Draft SEIR, which provides a list of issues/concerns and their reference in this document.

Post-scoping Meeting ⁴

In response to testimony received during the public scoping meeting, written comments received from internal City departments and Responsible Agencies during the NOP/Initial Study, and comments received from public agencies and companies in response to the NOEC, additional potential environmental issues were identified by City staff during a post-scoping meeting. These issues are addressed in the Draft SEIR and included the following: (1) the history of the County environmental process, County litigation, city variance history, and City revocation actions; (2) County projected landfill capacity studies; (3) meteorological conditions

² The public scoping meeting was held on Wednesday, April 29, 1992, from 7:00 to 10:00 p.m. Approximately 100 persons attended the meeting, and 21 people provided comments.

³ Information concerning the public scoping meeting is contained in the Draft SEIR Volume II, Appendices A8 consisting of Sunshine Canyon Landfill Scoping Meeting Agenda and Minutes; A9, Public Scoping Meeting Handouts and Proof of Publication; A10, Public Scoping Meeting List of Attendees, Speakers, and Comments Matrix; A11, Public Scoping Meeting Transcripts; and A12, Public Scoping Meeting Attendee and Speaker Cards.

⁴ The post-scoping meeting was held on June 4, 1992, with City staff, the environmental consultation, and the project proponent in attendance. The intent of this meeting was to define the scope of the environmental issues to be discussed within this Draft SEIR. A scoping meeting agenda, issue matrix, and meeting minutes are provided in Appendix A8.

at the proposed landfill site; (4) regional biota loss within the Santa Susana Mountains; (5) potential health and epidemiological conditions resulting from human habitation in proximity to the landfill site; and (6) the potential alternatives, including no project, reduced volume capacity, recycling/material recovery, alternative sites, open space, and remote landfill facilities.

Modifications to the Proposed Project ⁵

Modifications to the proposed project have occurred since the application was originally filed by the project proponent in June 1991. These modifications were in response to several issues including information that was not known or could not have been known in 1991, changes in conceptual design plans, and the settlement of outstanding litigation in connection with the County Landfill.

In regard to the settlement of litigation, a "Settlement Agreement"⁶ was entered into by the City and County on October 25, 1994, and by the City and the project proponent on December 8, 1995. Among other items, the terms of that agreement:

- resolved matters with respect to an access roadway provided with City jurisdiction to facilitate County Landfill operations and closure/post-closure of the existing inactive landfill,
- obligated the City to expedite all permits necessary for landfill-related activities pertaining to the County Landfill,
- obligated the City to dispose of an average of 1,250 tpd of solid waste into the County Landfill, and
- obligated BFI to fund City environmental programs throughout areas of the City.

Another example of a change is that landfilling operations at the proposed City/County Landfill are modified by this action to be performed at a single working face area. This combined landfilling operation would occur within 18 to 24 months following the commencement of landfilling operations in the City. This type of operation was not considered by the City in 1991 due to outstanding

⁵ These modifications do not reflect the removal of 100 acres for a natural buffer and addition of the 5-acre Added Area. Both modifications occurred later in the environmental process.

⁶ Copies of the Settlement Agreement are available for review in the Department of City Planning, City Attorney's Office, and County Counsel's Office.

litigation between the City and/or County relative to the County Landfill. Concurrent or separate operations in the City and County were addressed and analyzed in the FEIR. In addition, the initial mutual use of certain ancillary facilities (i.e., scale house, scales, leachate treatment and storage tanks, control building, etc.) was proposed so to alleviate facility redundancy and the immediate development of certain facilities in the City and to provide certain environmental protection and control measures prior to the start of landfilling operations in the City.

Other modifications were made with respect to design changes of originally proposed landfill ancillary areas or uses. For example, when the project application was filed, the proposed project included a yard trimming processing facility designed to handle an intake rate of 250 tpd and an open windrow composting area on ± 15 acres. Due to environmental considerations (i.e., odor), both the yard trimming processing facility and the open windrow composting components were eliminated as project features. The conceptual site plan originally submitted to the City and used during the NOP/Initial Study circulation period has been refined during this environmental process. Revised plans, which illustrate the proposed landfill footprint, ancillary facilities, and potential areas of development with the County, are included within Section 2.5, Project Characteristics of the Draft SEIR. This action has also required the development of the landfill take place in two phases.

CEQA Time Extensions ⁷

Several CEQA time extensions on the Draft SEIR were granted by the City due to outstanding litigation in connection with the approval of the FEIR by the Board. On July 24, 1997, the 90-day public review period commenced for the DSEIR. The review period was extended to December 5, 1997, upon request of the Twelfth Council District. The Notice of Completion and Availability (NOCA)⁸ and

⁷ Granted extensions are listed in the Draft SEIR, Appendix A15 and Public Notice. Refer to Draft SEIR, Appendix C3 for an overview of the litigation proceedings in connection with the County Landfill.

⁸ CEQA requires that upon the completion of a Draft EIR, an NOC is filed with the Office of Planning and Research indicating the project's location, the location of publicly available copies of the Draft EIR, and dates specifying the duration of the public review period. The public notice of availability of the Draft EIR is made by notifying parties that requested such notification and one of three methods: 1) publication in a newsletter of general circulation; 2) posting on and off the project site; and 3) direct mailing to owners of property contiguous to the project site.

Request for Comments were included with the DSEIR. These notices and the DSEIR were distributed to federal, state, regional, and local agencies; community homeowner associations; other interested parties; and libraries. The NOCA was published on July 24, 26, and 27, and on August 2 and 3, 1997, in the Signal, Saugus Enterprise, and Daily News. The NOCA was also published in the Los Angeles Times on July 24, 1997, as part of the City's notification process.

Brief Summary of the Environmental Documents

Draft SEIR (June 1997) ⁹

The Draft Subsequent Environmental Impact Report ("Draft SEIR or DSEIR"), Sunshine Canyon Landfill, State Clearinghouse Number 92041053 (Draft SEIR), was prepared for the purpose of analyzing the direct, indirect, and cumulative environmental effects associated with proposed City/County Landfill. It was prepared in compliance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the City of Los Angeles Guidelines for the Implementation of the California Environmental Quality Act of 1970, as amended in June 1992. The intent of the Draft SEIR is to disclose any potentially significant environmental effects of the proposed project, identify feasible ways to avoid or reduce significant effects, and describe reasonable alternatives to the proposed project.

Background information and specific studies relevant to the proposed project have been combined with prior technical information contained in the Final Environmental Impact Report ("FEIR"), Sunshine Canyon Landfill Extension (County Landfill), State Clearinghouse Number 89071210, certified in November 1993. The City Draft SEIR updates the existing background data and provides specific information about how the City/County Landfill Project would be designed, engineered, constructed, operated, and monitored throughout its estimated site life, and how closure and post-closure maintenance and monitoring would be conducted in accordance with Federal and State regulatory standards and requirements.

Public notice of availability begins the formal environmental public review period.

⁹ Refer to Attachment A-1 of the Planning Commission Transmittal which provides a reference to the issues and responses.

The Final Subsequent Environmental Impact Report ("FSEIR"), was prepared for the purpose of incorporating all public and agency comments received on the Draft SEIR. In accordance with the State CEQA Guidelines, the FSEIR includes the following: The Draft SEIR; comments and recommendations on the Draft SEIR; a list of persons, organizations and public agencies that commented on the Draft SEIR; responses to significant environmental issues raised during the Draft SEIR review and consultation process; and additional information by the Lead Agency.

A number of the Responsible Agencies ¹¹ commented on the Draft SEIR. Although some of the comments submitted by these agencies exceed their regulatory limitation, each comment was addressed in the Final SEIR.

Based on the comments received on the Draft SEIR by the Lead Agency, Responsible Agencies, and other interested parties, additions, changes and revisions are incorporated into Section 2.0 of the FSEIR.

Approximately 50 agencies, organizations, and individuals submitted written comments on the Draft SEIR for a total of over 1,700 individual comments. All written comments submitted in response to the publication of the City's legal notice and/or dissemination of the Draft SEIR or NOCA during the public review period (July 25 through December 5, 1997) were responded to in the FSEIR. Copies of the original comment letters received are included in the Final SEIR, Appendix C.

Addendum (Added Area)

Pursuant to CEQA §§ 15162 and 15164,¹² and Addendum has been

¹⁰ Refer to Attachment A-1 of the Planning Commission Transmittal which provides a reference to the issues and responses.

¹¹ A "Responsible Agency" is defined under CEQA, §15381, is public agency from which discretionary entitlements will be required but which is not the Lead Agency. As stated in the State CEQA Guidelines, §15096(d), comments submitted by Responsible Agencies on the Draft SEIR "shall be limited to those project activities which are within the agency's area of expertise or which are required to be carried out or approved by the agency or which will be subject to the exercise of powers by the agency."

¹² If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if

prepared to more clearly describe the deletion of the 100 acres open space area and the addition of the 5 acres remnant parcel. The Addendum discusses these requests and provide an environmental impact analysis. The report concluded that since the request does not involve any additional development or changes in the project description, there will be no additional impacts beyond those discussed in the Draft and Final SEIR.

General Plan Advisory Board (GPAB)

Pursuant to City Charter § 95.5 GPAB and § 96.5(3) (Procedure), the GPAB met on January 27, 1999, and advised the Director of Planning to present the recommended actions for approvals. Several members had concerns and comments that were addressed by Planning staff.

Public Participation

Public participation is a dialogue, a two-way communication that involves both distributing information to the public and in turn receiving ideas, issues and concerns from the public. For the subject project, information was prepared and distributed to several thousand individuals. The issues and concerns raised by the public were condensed to a list of topical issues with each being addressed with a response (Refer to Attachment No. A-1).

A combination of several public participation techniques were used. Briefings were held, newsletters were mailed out, technical and environmental documents were made widely available, presentations to civic and technical groups were given, site tours were conducted, and state-of-the art presentation techniques were used to attempt to reach a broad populace.

A public participation program is measured in part by the degree the public can comment on and influence decision making. Issues and comments raised through the planning process coupled with two lawsuits and settlement agreements helped revise the Landfill siting process, encourage communication between key constituencies, and provided forums for attempting to achieve consensus.

The technical nature of this subject, its voluminous documentation

required under subsection (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation. ... An Addendum need not be circulated for public review but can be included in or attached to the final EIR The decision making body shall consider the addendum with the final EIR ... prior to making a decision on the project.

and detailed planning and legal history were difficult communication hurdles to overcome. Notwithstanding these issues, the public participation component of this project can be credited for obtaining a descriptive understanding of the public's support and opposition to the proposed project. This was accomplished through the following processes:

- Notice provided to the public. In every situation notice to the public of a meeting, hearing, or workshop exceeded the typical or legal requirement. The mailings were expanded to 8,000 residents, publications were in more than one newspaper of general circulation, and documents were made available at a number of libraries;
- Ability to be heard. At the Key Group meeting and public hearing, time was allocated to ensure that everyone had an opportunity to speak. No time limits were applied at the Key Group Meeting and the record was left open for 45 days to allow additional time for interested parties to participate. The public hearing had time limits and the record was left open for 35 days to allow additional time for interested parties to provide testimony.
- Detailed and well documented responses were prepared that addressed all points raised by the participants, orally and through written correspondence.

CEQA Public Scoping Meeting.

As part of the environmental process, a public scoping meeting, coordinated by City Planning staff and facilitated by an independent consultant, was held on April 29, 1992. A number of issues were raised during the scoping meeting and are presented in Appendix A10 of the Draft SEIR.

Key Group Meeting/Open House.¹³

A part of the Major Plan Review discretionary action, the City Planning Department required the applicant to hold a community meeting. The meeting was held on November 18, 1997.

Notification for the Key Group Meeting/Open House was sent on November 5, 1997 to approximately 8,100 owners/occupants located within a 2-mile radius of the landfill site. In addition, a number of presentations were made and notices distributed by BFI to community groups and representatives. Notices were published on

¹³ Key Group Report, January 1998.

November 12th and 13th, 1997 in the *Daily News*, *The Signal*, and *Saugus Enterprise* newspapers.

An estimated 85 individuals attended the meeting and 66 submitted registration cards. Ten individuals submitted comments at the November 18, 1997 meeting and seventeen individuals submitted comments between November 19th and December 5th, 1997 directly to City Planning staff. The Key Group/Open House Reports address the comments of these individuals and of all those who spoke at the meeting.

A report was prepared by Ultrasystems Environmental Incorporation, on behalf of the project proponent, to address verbal and written comments raised on the requested General Plan Amendment/Zone Change for the proposed Sunshine Canyon Landfill Project and those comments received by the City Planning staff between November 19 and December 5, 1997.

Hearing Examiner Public Hearing.

On October 29, 1998, a public hearing was held on the subject request at John F. Kennedy High School Auditorium, 11254 Gothic Avenue, Granada Hills, California. The number of speakers exceeded the allocated time and a medical emergency limited the time for obtaining testimony. Therefore, the record was left open for 35 days, until December 3, 1998, to allow the public time to provide additional and detailed testimony and for the applicant's representatives to submit additional information related to specific questions asked at the public hearing and requested by the Hearing Examiner.

The results of the public hearing are as follows:

1. Present: 345
2. Public Hearing Speakers/Correspondence:
 - (17) in favor:
 - (59) in opposition
 - (21) general comments
3. Post-Public Hearing Correspondence Received: The record was left open until December 3, 1998 (35 days) to allow the public and project proponent additional time to raise and address issues. The following information was submitted during the given time period:
 - Transcripts of the October 29, 1998 Hearing Examiner Public Hearing.
 - Applicant's November 19, 1998 Responses to the

Hearing Examiner's October 23, 1998 and November 12, 1998 letters.

- Applicant's December 3, 1998 Supplemental Responses to Hearing Examiner's October 23, 1998-letter.
- Applicant's December 1998 Responses to Oral and Written Comments received from the Public Hearing.

Comments and Responses: Throughout the CEQA and general plan amendment/zone change process, the public has raised issues and concerns which have been addressed by the project proponent in several documents. The attached matrix (Attachment No. A-1) was prepared to delineate where each issue topic and response can be found in the record (e.g., documents including Key Group Meeting, Draft SEIR, Final SEIR, Public Hearing, and Post-Correspondence to the Public Hearing).

In the next section, several environmental and planning issues are discussed in order to highlight items the Hearing Examiner observed as important.

HEARING EXAMINER COMMENTS

Comprehensive Planning.

A fundamental principle of land use planning is the allocation of land uses to accommodate growth. In the *Citywide General Plan Framework Element*, its long-range growth strategies, " . . . in all instances, are to seek solutions to public infrastructure and service deficiencies, including their expansion commensurate with the levels of demand experienced." ¹⁴ Findings Nos. 1.A, 1.C, 1.D and 2.A, relating to comprehensive solid waste management plans prepared by the City and County of Los Angeles, outline the comprehensive planning efforts to ensure that solid waste capacity is matched with the City's growth.

As noted in Finding No. 1.C, 1.D, and 2.A, reports from the City and County of Los Angeles predicted a shortage in solid waste capacity in the region by the end of the decade. The crisis has not happened due to lower annual waste-generation and full compliance with the State recycling mandates of AB939. Nonetheless, jurisdictions cannot postpone making decisions about expanding existing landfills due to the lengthy and costly new landfill siting process and uncertainties of alternatives such as waste-by-rail. Decisions made now will provide greater certainty and help create a more stable economic environment in which the City can

¹⁴ *Framework Element*, pg. 9-1

long-term needs.

The concern over future solid waste capacity for our City is also discussed in other reports that are part of the City's long-range planning efforts. As part of the Community Plan Revision Process (CPR)¹⁵, the environmental analysis concluded that the lack of solid waste disposal capacity is an "unavoidable significant" adverse impact of the growth anticipated in the Land Use Elements of several community plans. The studies found that significant impacts would occur due to the proposed plan revisions which would accelerate the need for additional waste disposal sites or expansion of existing landfills. Several of these plans are:

Chatsworth Porter Ranch District Plan Restudy - July 14, 1993
Draft EIR No. 89-0018, SCH No. 89032919 (Section 4.10.7, pp 4.10.7-1 through 4.10.7-7);

Granada Hills-Knollwood District Plan Restudy - July 10, 1996,
Draft EIR No. 93-0041, SCH No. 94041027 (Section 2.11, pp. 2.11-3 through 2.11-15);

South Central Los Angeles Community Plan Revision - Approved by CPC April 9, 1998, Final EIR No. 96-0027(CPR), SCH No. 96011032 (Section 4.4, pp. 4.4-19 through 4.4.-25);

Southeast Los Angeles Community Plan Revision - Approved by CPC April 9, 1998, Final EIR No. 96-0026(CPR), SCH No. 96011034 (Section 4.4.4 pp. 4.4-18 through 4.4.4-24);

Sylmar Community Plan Revision - August 6, 1997, Final EIR No. 90-0614(CPR), SCH No. 90010790 (pp. 4.4-17 though 4.4-21); and

West Adams-Baldwin Hills-Leimert Community Plan Revision - May 6, 1998, Final EIR No. 90-0833(CPR), SCH No. 91011070 (pp. 67-8 and 143-146).

Consequently, adopting the proposed recommendations would implement the policies of several comprehensive plans as well as provide for the expected solid waste needs of all communities in the City.

¹⁵ The CPR process was to restudy, update, and revise the 35 community and district plans which constitute the Land Use Element of the City's General Plan.

Environmental Impacts and Mitigation (Refer to the Attachment No. A-1)

The City, as mandated by the State of California, has been very successful in diverting solid waste from landfills. According to Denis Keyes, Statistician for the City of Los Angeles Bureau of Sanitation, Citywide Recycling Division, the latest diversion rate for recycling was 46.6 percent in 1997. Nonetheless, as noted in the "Local Disposal" policy stated in Chapter 6 of the October 1993 Phase IV Report, Solid Waste Management Policy, even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated within the City.

The SEIR considered alternatives such as potential/proposed landfill sites in Los Angeles and Riverside counties and remote landfill facilities either in State or out-of-State.¹⁶ It is determined that these alternatives have potentially greater environmental impacts on earth resources, air quality, biological resources, light and glare, land use, transportation, recreation, and aesthetic/views than the proposed project.

As noted in the CEQA findings (Section No. 3), all impacts of the proposed use would be mitigated to a level of insignificance except Air Quality. The following is a discussion of several impacts highlighted in the public hearing testimony: ¹⁷

Air pollution¹⁸ is a major concern caused by construction

¹⁶ A summary matrix in the Draft SEIR, Table 5.3-1 presents a comparative assessment of these alternatives by topical issue. Also, see Draft SEIR, Section 5.7.1, p. 5-27.

¹⁷ The list represents just several impacts that were the primary focus in issues raised by the public. Refer to Attachment No. A-1 in the Planning Commission Transmittal for a extensive listing of the issues and concerns.

¹⁸ For a complete discussion of impacts relating to Air Quality (Construction and Operations), please see Section 4.2 of the Draft SEIR; Appendix D2 of the Final SEIR, containing revisions to Section 4.2 of the Draft SEIR; Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein; Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions, Topical Issue 25: Performance of a Health Risk Assessment, and Topical Issue 27: Revised Air Quality Data contained in the December, 1998 Responses to Comments Public Hearing of the General Plan Amendment/Zone Change (October 29,

activities in preparing the landfill and disposing of solid waste due to the uncontrolled release of dust, smoke, odors, and possibly harmful gases. Pursuant to Public Resources Code § 21081(a)(1) and CEQA Guidelines § 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project which will substantially lessen the significant environmental effects relating to air quality. However, the impacts will remain significant because NO_x, and PM₁₀ emissions will exceed the thresholds of significance. (Refer to the following chart)

As discussed in Section No. 3 (CEQA Findings) and Statement of Overriding Considerations (Exhibit No. E-9), the Hearing Examiner is recommending that the Planning Commission determine that the impacts to Air Quality are acceptable because the benefits of the proposed project outweigh this unavoidable impact to the environment. It is also recommended that the mitigation measures in the FSEIR be incorporated into this action as conditions of approval and that additional conditions be required that further lessen the impact to air quality.

COMPARISON OF PROJECT EMISSIONS AND SIGNIFICANCE THRESHOLDS

<u>Pollutant</u>	<u>Construction Criteria (lb/day)</u>		<u>Construction Criteria (tons/qtr)</u>		<u>Operational Criteria (lb/day)</u>	
	<u>Sig Threshold</u>	<u>Mitigated Project¹</u>	<u>Sig Threshold</u>	<u>Mitigated Project²</u>	<u>Sig Threshold</u>	<u>Mitigated Project³</u>
CO	550	236	24.75	9.2	550	1630
NO _x	100	824	2.5	32	55	2210
ROG	75	60	2.5	2.3	55	325
SO _x	150	55	6.75	2.1	150	576
PM ₁₀	150	197	6.75	7.7	150	363

Source: Significance Levels in the SCAQMD CEQA Air Quality Handbook, Chapter 6.

Note:

- 1 From Table 4.2-17 (revised), Final SEIR
- 2 Based on daily emissions, 6 days per week.
- 3 From Table 4.2-18 (revised), Final SEIR.

At the public hearing, a representative of the Los Angeles

1998).

Unified School District ("LAUSD") stated that emissions from heavy duty diesel vehicles (i.e., both landfill equipment and waste trucks) may have long-term health consequences due to diesel particulate matter and the potential for exceedance of the nitrogen dioxide (NO₂) standard. The representative contended that these impacts would potentially create a significant human health impact through carcinogenic risks to the students and faculty at Van Gogh Street Elementary School. In response to these statements, the project environmental consultants concluded that the LAUSD analysis is flawed and that the landfill will not result in an adverse health impact on nor exceed the NO₂ standards for the elementary school. (Exhibit No. E-15)

CEQA states that "disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts." ¹⁹ Interestingly, CEQA Guidelines discuss a court case which involved Browning-Ferris Inc. that concluded "an EIR is a disclosure document and as such an agency may choose among differing expert opinions when those arguments are correctly identified in a responsive manner." ²⁰

After consideration of all the evidence, the record provides sufficient information that supports a judgement to discharge LAUSD's contentions. For a detailed discussion of Air Quality, refer to Section 4.2 of the Draft SEIR; Appendix D2 of the Final SEIR, containing revisions to Section 4.2 of the Draft SEIR; Tables 3-1 and 4-1 in the Final SEIR and the Responses to Comments referenced therein; Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions, Topical Issue 25: Performance of a Health Risk Assessment, and Topical Issue 27: Revised Air Quality Data contained in the December, 1998 Responses to Comments Public Hearing of the General Plan Amendment/Zone Change (October 29, 1998).

Potential seismic hazard,²¹ is a major concern that was raised in statements made at the Key Group Meeting, comments to the Draft SEIR, by the Twelfth District City Council Office at the public hearing, and through subsequent correspondence. The Draft SEIR identified that the project site is located within the influence of

¹⁹ CEQA Guidelines § 15151 (Standards for Adequacy of an EIR)

²⁰ *Ibid.*

²¹ For a complete discussion of impacts relating to Earth Resources (Seismicity), please see Section 4.1.3 of the Draft SEIR; Table 3-1 and the Responses to Comments referenced therein in the Final SEIR; Topical Issue 1: Seismicity and Topical Issue 2: Landfill Stability During Northridge Earthquake.

several fault systems that are considered active or potentially active and could cause primary fault rupture, secondary ground rupture, and strong ground shaking. The San Fernando-Sierra Madre Fault, with a site-to-source distance of 3.0 miles, is the closest fault to the project site. In addition to known faults that could impact the site, recent research indicates that "blind faults" (faults that apparently have not broken the surface and display little or no surface expression) may underlie the Los Angeles Basin and adjacent areas.

As discussed in the Draft SEIR, the now inactive Sunshine Canyon Landfill experienced minor impacts during the 1971 San Fernando and the 1994 Northridge earthquakes. After extensive field investigations, results concluded that fault rupture from the 1971 San Fernando earthquake did not occur within the project site boundary and that known fault traces within the site boundaries do not show evidence of fault displacement in Holocene time. The 1994 Northridge earthquake produced no significant adverse impacts within the project site. No cracking or deformation in the waste mass was found at the base of the former City Landfill. Minor and repairable cracking, were limited to the intermediate cover soils, with no waste exposed.

The Draft SEIR also stated that strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment systems (i.e., the liner, cover, leachate collection and removal, gas extraction, and surface water drainage systems).

Based on the analysis presented in the Final SEIR, mitigation measures were recommended that are incorporated into the conditions of approval. Most important, the landfill will be designed and constructed to meet State seismic design requirements²² which will enable the facility "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas."

Also, as required by the conditions of approval, the landfill design and seismic analysis will have on-going review and inspection by State and local agencies. If an earthquake were to occur measuring 5.0 on the Richter scale or greater near the project site, the conditions require that a registered engineering geologist compare operating parameters and site conditions after

²² CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design); RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas); CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria)

major earthquake events to verify that environmental protection systems are operational.

Litter²³ is a major concern as identified in statements made at the Key Group Meeting, comments to the Draft SEIR, by the Twelfth District Council Office and other speakers who testified at the public hearing, and through subsequent correspondence. Litter does not cause serious harm to the environment, but it is a nuisance and has aesthetic impacts. The subject site is located on the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, where during high wind conditions, litter can be transported offsite.

It was not clear from the public testimony, if the litter problems were due to the current County operation, previous City operation before March 14, 1988²⁴, or after this period when there was expanded oversight and enforcement of the City landfill before closure in 1991. However, the proposed expansion of the Landfill could generate offsite migration of litter onto surrounding land uses, if not properly mitigated.

The project proponent's volunteering 100 acres of natural buffer, located between the proposed landfill footprint and the nearest residential, will provide protection and a natural filter from litter. The additional setback between this natural buffer, the ridges, and the landfill footprint increases the protection to the residential community. Based on the analysis presented in the Final SEIR, the recommended mitigation measures would minimize litter generation. Moreover, the environmental mitigation measures were supplemented by conditions in order to provide additional assurances that litter and debris is contained within the landfill property boundaries and that waste materials blown from or dropped by refuse-hauling vehicles en route to a landfill or at the landfill site is minimized. The conditions are modeled after those required for the operations of County Landfill and Lopez Canyon Landfill where both have extensive litter control programs with specific preventative and response measures to control windblown litter and debris onsite and within the vicinity of the landfill

²³ For a complete discussion of impacts relating to Risk of Upset (Litter), please see Section 4.9.3 of the Draft SEIR; Table 3-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 18: Litter Control.

²⁴ Zoning Administrator public hearings for "Consideration for Revocation" (i.e., ZA 17804(RV)) and later in December 1990, for a "Curative Variance" (i.e., ZA 89-1129(ZV)) which mark a turn in the history of the landfill operation due to a broadened enforcement program by the City.

site.

Groundwater quality ²⁵ was another concern raised by Council District 12 and through the public participation process. The concern is migrating leachate from saturated refuse or breaks in the liner due to seismic activity causing degradation in the groundwater quality and potentially harming the City's water supply at Van Norman Dam.

It should be noted that since 1958 a landfill has operated on the subject site and has not resulted in contamination of sources of potable water. A groundwater extraction trench, approximately 200 feet long, is located across the landfill access roadway near the southeast toe of the inactive City landfill that is part of a comprehensive groundwater monitoring system. Tests of the groundwater from this trench have not indicated migration of contaminated water from the existing landfill.

Review of Mitigation Measure Nos. 48-49 (Exhibit No. E-9) specifically address the potential impact of groundwater. The use of composite liners, groundwater monitoring wells, a protective toe berm at the landfill terminus, leachate removal and treatment systems, gas collection systems, and other environmental systems ensure that groundwater is not adversely impacted by the landfill.

The design, operation, and final closure of the proposed landfill will be monitored by the City Environmental Affairs Department (i.e., Local Enforcement Agency), Integrated Waste Management Board, Los Angeles Regional Water Quality Control Board, and other agencies who share in the responsibility to ensure that the landfill does not create significant environmental impacts on local or regional water supplies.

Fiscal Impacts

Fiscal Impacts are not directly related to the issues before Commission; however, a "Fiscal Impact Statement" will be prepared for City Council pursuant to Council Directive (C.F. 95-2400).

A memoranda from City of Los Angeles Bureau of Sanitation (Attachment No. A-2) provides insights into what may be analyzed in the Fiscal Impact Statement. The memoranda presents a "highly

²⁵

For a complete discussion of impacts relating to Surface and Groundwater (Surface Water), please see Section 4.3.1 of the Draft SEIR; Table 3-1 and the Responses to Comments referenced therein in the Final SEIR; and Topical Issue 5: Stormwater Runoff Control Measures.

probable" scenario that would occur if the Bradley Landfill closes to the public and the Sunshine Canyon Landfill does not receive its expansion permit.

The memoranda states, " ... the decrease in competition of local refuse through the mergers and acquisitions of the waste management industry in the past year may serve to drive up prices for all disposal customers in Los Angeles County. This would be most significant for City residents, as the majority of the County-owned and operated landfills, which serve as a cost controlling factor for the region, are not available to any haulers from the City of Los Angeles."

"Current refuse transfer and disposal fees are budgeted at \$25 million per year. In the most likely scenario, the loss of local landfill capacity, the projected increase in refuse tipping fees would be over \$10.6 million per year, bring the total of refuse transfer and disposal only to over \$35.6 million per year. In contrast, if the City can continue to dispose of its refuse in the Sunshine Canyon Landfill **under the same contract price with CPI escalation** for a significant term of 15-20 years or more, the increase in disposal fees would be strictly limited to CPI and population factors. Also, the City would not incur the capital cost of developing a new transfer station in the San Fernando Valley." The capital cost of a transfer station in the valley is estimated at \$10,000,000.

In a January 20, 1999 report by the Rose Institute of State and Local Government²⁶, conclusions were reached that support the above statements. It is stated in the report that, "with its merger with USA Waste Services, Waste Management, Inc. now is in a position to exercise substantial market control in the entire southern California region. As of the date of writing this report, the Sunshine Canyon Landfill in Granada Hills is the only major private landfill in all of Southern California that is not controlled by Waste Management. As recently as two years ago, **six different** private firms operated and controlled landfill major sites in the region. And, as shown above, not only are two of the three in-state rail sites controlled by Waste Management, but two of the four out-of-state waste-by-rail sites are controlled by Waste

²⁶ The Rose Institute of State and Local Government, located on the campus of Claremont McKenna College and founded in 1973. The Rose Report, the newsletter of the Rose Institute, was created to highlight current projects as well as to display the various undertakings of the Institute.

Management as well. This fact should be of concern to Los Angeles County" ²⁷

Proper Planning Tool and Land Use Compatibility

Proper Planning Tool

A landfill on the subject site operated from 1958 to 1991. The Zone Variance was originally used to grant entitlements and was once the appropriate planning tool. However, in December 1990, John Parker, the City's Associate Zoning Administrator, indicated the following in reference to this planning tool:

"In the opinion of the Administrator, no future entitlements with respect to Sunshine Canyon Landfill should be considered under a zone variance process. The findings for a zone variance do not speak to the merits of the project, but more directly to hardships, special circumstances and property rights, which are arguably not the most appropriate findings for this type of case. Two other avenues for seeking discretionary entitlements would be more appropriate: 1) a change of both the zone and General Plan designation of the property (e.g., to the (Q) M3 Zone limited solely to landfill uses, and to a community plan designation with a landfill symbol and/or heavy industry land use; or 2) a conditional use application to the City Planning Commission under LAMC Section 12.24-B,1(k); "Public utilities and public service uses or structures." ...

"The benefit of either a zone change/plan amendment or conditional use approaches is that solid waste disposal is clearly a regional issue invested with a public interest, which deserves both a large arena of discussion and a coherent policy voice. A zone change/plan amendment would go to both the City Planning Commission and City Council; a conditional use would go to the City Planning Commission, and to the Council under appeal. On the other hand, a use variance goes to a Zoning Administrator and on appeal to the Board of Zoning Appeals (from which an appeal to the City Council would occur only if the BZA approves the variance in some form). Cases of this caliber should not have the potential for going to disparate bodies which may perceive merit in different ways (and arguably must, since the variance finding address merit

²⁷ *Regional Solid Waste Management in Souther California For the New Millennium, A Report by the Rose Institute of State and Local Government, January 20, 1999., p. 72*

far less than do either conditional use or zone change findings)." ²⁸

The General Plan is an appropriate planning tool considering that a sanitary landfill is primarily one-of-a-kind citywide facility which is a necessary part of a City's infrastructure planning. The significance of using a long-range planning tool for solid waste management is reiterated in the State Planning and Zoning Sections 65301 and 65302 and in *Concerned Citizens v. Calaveras County* (1985) 166 Cal. App.3d 90. In the State Planning and Zone regulations, under requirements that apply to charter cities, it states "The plan shall include the following elements: (a) A land use element which designates the proposed general distribution and general location and extent of the uses of land for ... solid and liquid waste disposal facilities" ²⁹ *Concerned Citizens v. Calaveras County* (1985), held that the general plan is not required to identify existing solid waste disposal sites. However, because the purpose of the land use element is to designate "the proposed general distribution and general location and extent" of land uses, the element must identify future sites. ³⁰

The limitation in using the General Plan/Zone Change planning tool is in applying performance standards, dynamic site standards, and on-going monitoring and permit modifications. In applying performance standards, they must be continuously monitored and controlled to protect the public health, safety, or welfare related to such issues as:

- 1) Noise, air, and water pollution;
- 6) High volume of heavy truck traffic and associated noise, odor, and other potential nuisance-like characteristics;
- 3) Storm water drainage and erosion; and
- 7) Other operational requirements which are necessary and reasonable to make such activity compatible with neighboring land uses likely to be effected by such activity.

Q Conditions are usually not effective in on-going monitoring and permit modifications. However, mitigation monitoring and reporting requirements of CEQA and changes in the Municipal Code

²⁸ (Source: City of Los Angeles Correspondence RE: Case No. ZA 89-1129(ZV), December 31, 1990.)

²⁹ Section 65302 (Elements required to be included in the plan)

³⁰ General Plan Guidelines

increased the City's authority on ensuring compliance with Q Conditions. The recommended action includes several conditions that narrow the gap between using the general plan amendment/zone vs. conditional use permit planning tool.

One, the following conditions ensure that the recommended mitigation measures in the Final SEIR are **requirements of the proposed project**:

"Mitigation Monitoring and Reporting Program (Exhibit No. E-9) is hereby incorporated into these conditions. The permittee shall fully perform each action required of the program as if it were specifically set forth in these conditions."

"Revised Mitigation Monitoring and Reporting Program (MMRP). The permittee shall submit a revised Mitigation Monitoring and Reporting Program ("MMRP") satisfactory to the Department of City Planning that incorporates all mitigation measures required in the Final SEIR (State Clearinghouse No. 92041053) as amended by this action. The Applicant shall also identify mitigation monitor(s) who will provide annual status reports as noted above and in the MMRP, beginning immediately at commencement of the operation until five years after commencement of Phase II of the operation. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, operation, closure, and post-closure) to ensure continued implementation and adequacy of the mitigation measures.

Mitigation and Monitoring Program. Attached to these conditions is a Mitigation and Monitoring Program (Exhibit No. E-9) which is hereby incorporated into these conditions. The permittee shall fully perform each action required of the program as if it were specifically set forth in these conditions."

Two, the following enables **monitoring of compliance** with the conditions:

"Phasing. The permittee is permitted to fill in two phases. For each phase, the permittee shall provide proof of compliance with the conditions of approval, facility plans, including pre-disposal topography of the site, the facility boundary of the site (clearly illustrating parcels owned by the operator and/or any parcels leased), the total permitted acreage of the site, the acreage of the disposal area, filling

sequencing and excavation plans, the extent of any M3 buffer zones between the disposal area and permitted property boundaries provided by the facility layout, and the vertical limits of the site. The Local Enforcement Agency and Planning Department shall coordinate review of the plans."

"Annual Reports. The permittee shall submit annual reports to Department of City Planning Department. The reports shall include, but not be limited to, Hotline/Emergency Log summaries, daily tonnage figures, readings and analysis of the effectiveness of landfill gas monitoring activities, noise measures, discussion on litter prevention, and overall compliance with the conditions of the subject approval."

Three, the following conditions place the permittee on notice of the City's authority to **compel compliance**:

"Failure of the permittee to cease any development of activity that is not in full compliance shall be a violation of these conditions."

"To the extent permitted by Public Resources Code Section 45005, the Local Enforcement Agency shall have the authority to order the immediate cessation of landfilling or other activities at the site, if it determines that the inhabitants of the City are under imminent and substantial risk to health, safety, or welfare. Such cessation shall continue until such time as the Local Enforcement Agency determines that the conditions leading to the cessation have been eliminated or reduced to a level which no longer poses an unacceptable threat to such health, safety, or welfare."

"Notice is given that pursuant to the Section 12.27.1 (Administrative Nuisance Abatement), the City Planning Commission or Zoning Administrator, after conducting a public hearing, may revoke or modify this approval, if the Commission or Zoning Administrator find that these conditions have been violated or that this approval has been exercised so as to be detrimental to the public health or safety or so as to be a nuisance."

Four, the following conditions ensure the **City will be able to initiate mitigation measures, if the permittee does not respond** in a reasonable manner to compliance requests:

"Bond. Performance bonds or letters of credit stating the amount, duration, and supervisory agency shall be established. Prior to commencing construction of the

landfill, a bond in the minimum amount of \$3,000,000 shall be provided to the Director of Planning to finance litter, traffic, and community protection program mitigation measures not responded to by the permittee in a timely and reasonable manner."

Land Use Compatibility

The site is isolated from populated areas to the south due to the topography, surrounding land uses, and proximity to a freeway network. The perimeter ridgelines of subject site, near the City/County boundary, rise to a maximum elevation of about 2,150 feet MSL. The existing southern fill limits of the inactive landfill (i.e., larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the proposed landfill final elevation from the south and southwest, especially from residential uses located in the community of Granada Hills-Knollwood.

The existing perimeter ridgeline, 100 acre natural buffer to the south, freeway network to the east, existing County Landfill to the northwest, and portions of the existing inactive landfill form an effective transition between surrounding uses and the proposed landfill operations and activities. The proposed project would not affect privacy nor would it hinder the interaction or movement of people and goods. The proposed project would be physically compatible and consistent with its surrounding environs, including existing residential land uses located near the project site.

Also, the proposed use is appropriately located adjacent to an operating landfill in the County. The proposed City Landfill footprint would connect with the operational ±215 acre County Landfill. Under the approval, the permittee would be allowed to operate the "Immediate Combined City/County Landfill Operations Alternative" as described in the Draft SEIR. The Draft SEIR also described the sequencing of the fill as follows: "Development of the landfill footprint would initiate in the City jurisdiction, abut and overlay portions of the inactive landfill (Sequence A), proceed in a northerly direction across the City and County boundary, and connect to the operational County Landfill (Sequence B). Once interim fill elevations are reached, the landfill footprint would extend back into the City jurisdiction (Sequence C)."

Efficient use of landfill land after the completion of filling requires long-range planning. The potential uses for a closed

sanitary landfill include:³¹

Nature park;
recreation park;
wild area;
animal refuge;
tennis court;
golf course;
ski or toboggan hill;
parking lot; and
commercial or industrial building.

In the subject case, the SEIR states that the decision of future uses depends on factors such as settlement, foundation characteristics, control of leachate and gas, vegetation, and final grade. Also, the existing topography limits the type of potential future uses. The recommended conditions of approval ensure that the subject site is currently used only for landfilling, ancillary uses, and previously permitted uses; that during the closure and post-closure period uses are limited to those necessary for such activity; and that after the post-closure period, or as time deemed appropriate by Integrated Waste Management Board, the site will be considered for recreational/open space uses as required by Condition No. B.6.c.

RECOMMENDATIONS

After thorough review of the statements in the application, statements made at the public hearing before the Hearing Examiner on October 29, 1998, and additional evidence investigated and made part of the record, as well as knowledge of the property and surrounding area, I find that AFFIRMATIVE FINDINGS CAN BE MADE.

I therefore, recommend approval as outlined in Section No. 1 (Recommendations) for the following reasons:

- **The relationship of the requests and proposed use with adopted comprehensive plans.**

By adopting the recommended action, the City will implement its comprehensive plans which seek solutions to the solid waste infrastructure and service deficiency. Findings Nos. 1.A, 1.C, 1.D

³¹ Source of list: Phil O'Leary, Engineering Professional
Development, UW-Madison, 432 N. Street, Madison, WI 53706 (608)
262-0493.

and 2.A, relating to comprehensive solid waste management plans prepared by the City and County of Los Angeles, outline the comprehensive planning efforts made to ensure that solid waste capacity is matched with the City's growth.

Approval of the recommended action would also enable the City of Los Angeles to fulfil a state mandate. AB 939 requires cities and counties to plan for 15 years of future solid waste disposal capacity, in addition to implementing source reduction and recycling programs.

- **The compatibility of the proposed use with previous uses and adjacent existing uses.**

By adopting the recommended action, it will allow the expansion of a landfill in the City that would occur mostly on land that has been disturbed. Previous landfilling activities have occurred on the subject site from 1958 until the expiration of its zoning variance on September 21, 1991. Development of the proposed project would encompass ± 80 acres of the existing inactive City landfill.

Of the undisturbed area, several acres of streamzones, wetlands, and riparian habitats will be eliminated. Habitats (i.e., wetlands and riparian) will not be reestablished within this area due to unsuitable conditions for establishing wetland and riparian habitat. As a result of this determination, the project proponent is conditioned to provide off-site replacement of these resources. Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies for consideration to compensate for impacts on riparian and wetland resources as a result of project development. These sites include Bull Creek, Bee Canyon, and East Canyon, which are located proximate to the project site.

Of the undisturbed area, 592 oak trees will be lost. The conditions of approval require an oak tree replacement and maintenance program that exceeds requirements of the City's oak tree ordinance.

Approval of the recommended action would allow the City expansion to occur adjacent to an existing landfill. Since August 19, 1996, the County landfill has been in operation. The County CUP also granted the use of an additional 42 acres to connect with the City landfill, if approved. Approval of the recommended action could eliminate or lessen the potential for impacts to significant biological resources in the upper reaches of County portion of Sunshine Canyon. As stated in the County CUP and Oak Tree Permit (86-312-(5)), City approval of its expansion would avert the

removal of over 3,200 oak and Douglas Fir trees and significant biological resources in the upper reaches of Sunshine Canyon in the County.

- **Mitigation of Environmental Impacts.**

By adopting the recommended action, the environmental mitigation measures outlined in the Final Subsequent Environmental Impact Report would be conditions of this approval. As noted in the CEQA findings, all impacts of the proposed use would be mitigated to a level of insignificance except Air Quality. As discussed in Section No. 3 (CEQA Findings) and Statement of Overriding Considerations (Exhibit No. E-9), the Hearing Examiner is recommending that the Planning Commission determine that the impacts to Air Quality are acceptable because the benefits of the proposed project outweigh this unavoidable impact to the environment. The benefits of the project are:

Compliance with comprehensive, long term plans of the City and County of Los Angeles;

Provides an immediate solution to a potential future crisis in managing the City's solid waste;

Compliance with the State of California mandated requirements of AB 939 to provide a minimum 15 years of solid waste disposal capacity;

Provides a landfill within proximity to City generated waste streams;

Provides a landfill facility with local control over that facility;

Minimizes significant environmental impacts that would occur elsewhere as a result of developing new landfill sites or imposing longer transportation distances to remote facilities; and

Utilizes land that has been disturbed by previous landfill activities and is located adjacent to a currently operating landfill in Los Angeles County.

- **Lack of available environmentally safe and economical alternative locations or current feasible solutions.**

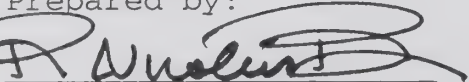
By adopting the recommended action, it would eliminate or lessen the short-term need to consider alternatives such as

potential/proposed landfill sites in Los Angeles and Riverside counties and remote landfill facilities either in State or out-of-State. The alternative sites evaluated in the Draft SEIR were Elsmere Canyon, Blind Canyon and El Sobrante. The Remote landfill facilities analyzed in the Draft SEIR were Eagle Mountain, Railcycle-Bolo Station, Mesquite Regional, and La Paz.

Currently, these options have potentially greater environmental impacts on earth resources, air quality, biological resources, light and glare, land use, transportation, recreation, aesthetic/views, surface water, parks, water supply, and paleontological resources than the proposed project.

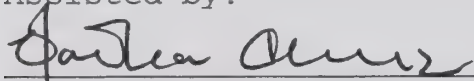
As noted in Finding No. 1.C, 1.D, and 2.A, reports from the City and County of Los Angeles, predicted a shortage in solid waste capacity in the region by the end of the decade. The crisis has not happened due to lower annual waste-generation and full compliance with the recycling mandates of AB939. Nonetheless, jurisdictions can not postpone making decisions about expanding existing landfills due to the lengthy and costly new landfill siting process and uncertainties of alternatives such as waste-by-rail. Decisions made now will provide greater certainty and help create a more stable economic environment in which we can plan for long-term needs.

Prepared by:



R. Nicolas Brown, AICP
Hearing Examiner, Metro

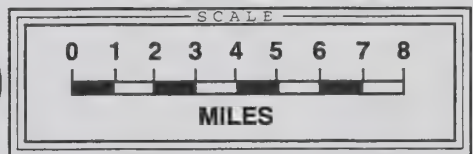
Assisted by:



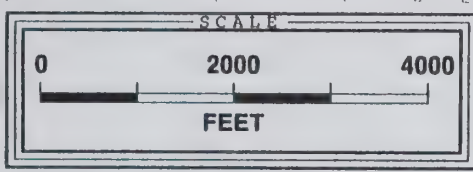
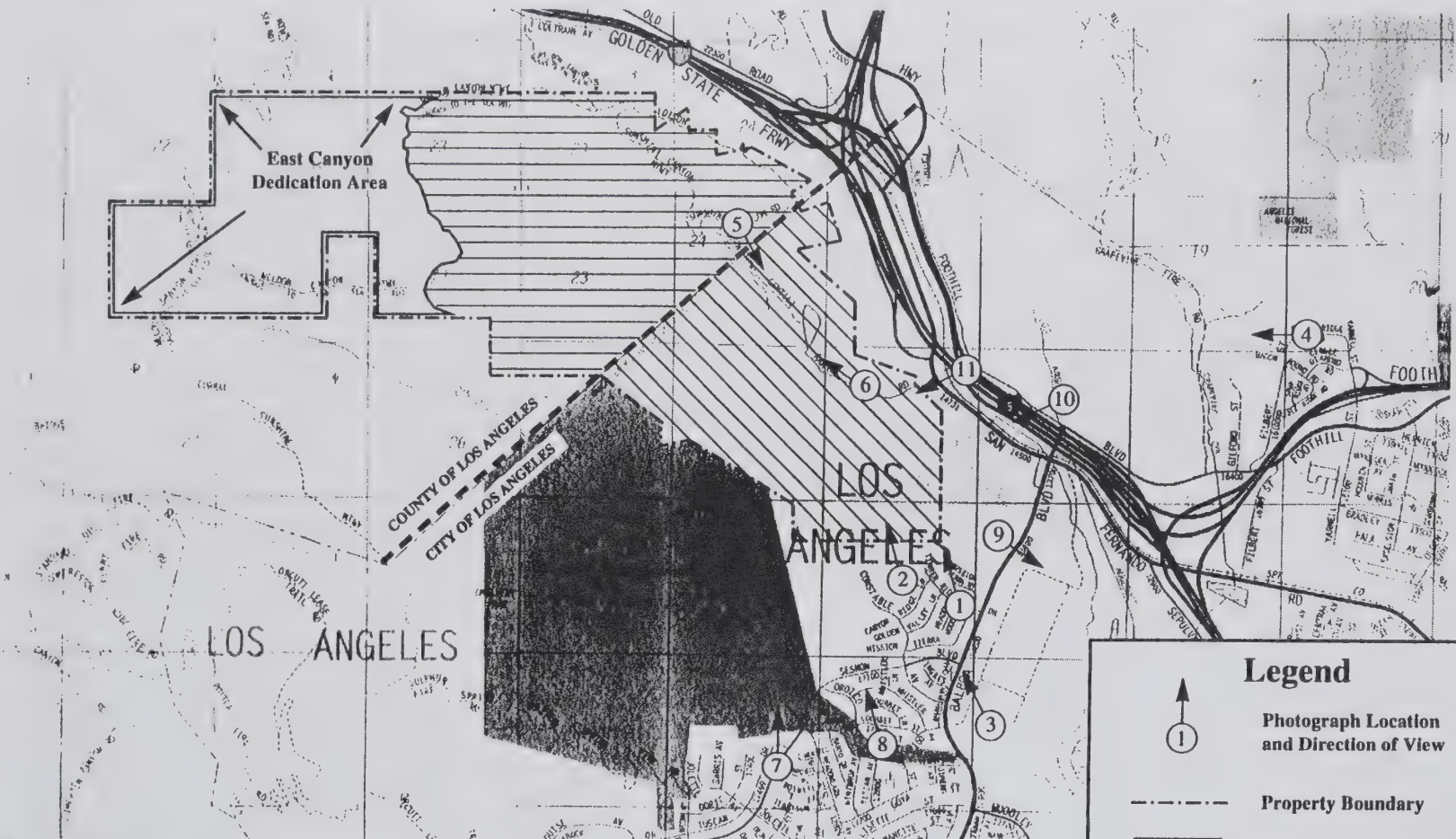
Madhu Kumar
City Planning Associate

LOCATION MAPS

- Exhibit No. E-1



Regional Location Map



Source: Ultrasonics Environmental Incorporated
Base Map: Thomas Bros. Maps

Legend	
	Photograph Location and Direction of View
	Property Boundary
	Project Site in City
	Project Site in County
	City/County of Los Angeles Boundary



**Photograph Location
Reference Map-Views (City)**

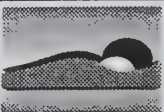
PROJECT SITE AND VICINITY MAP

- Exhibit No. E-2



Aerial Photograph taken September 9, 1993

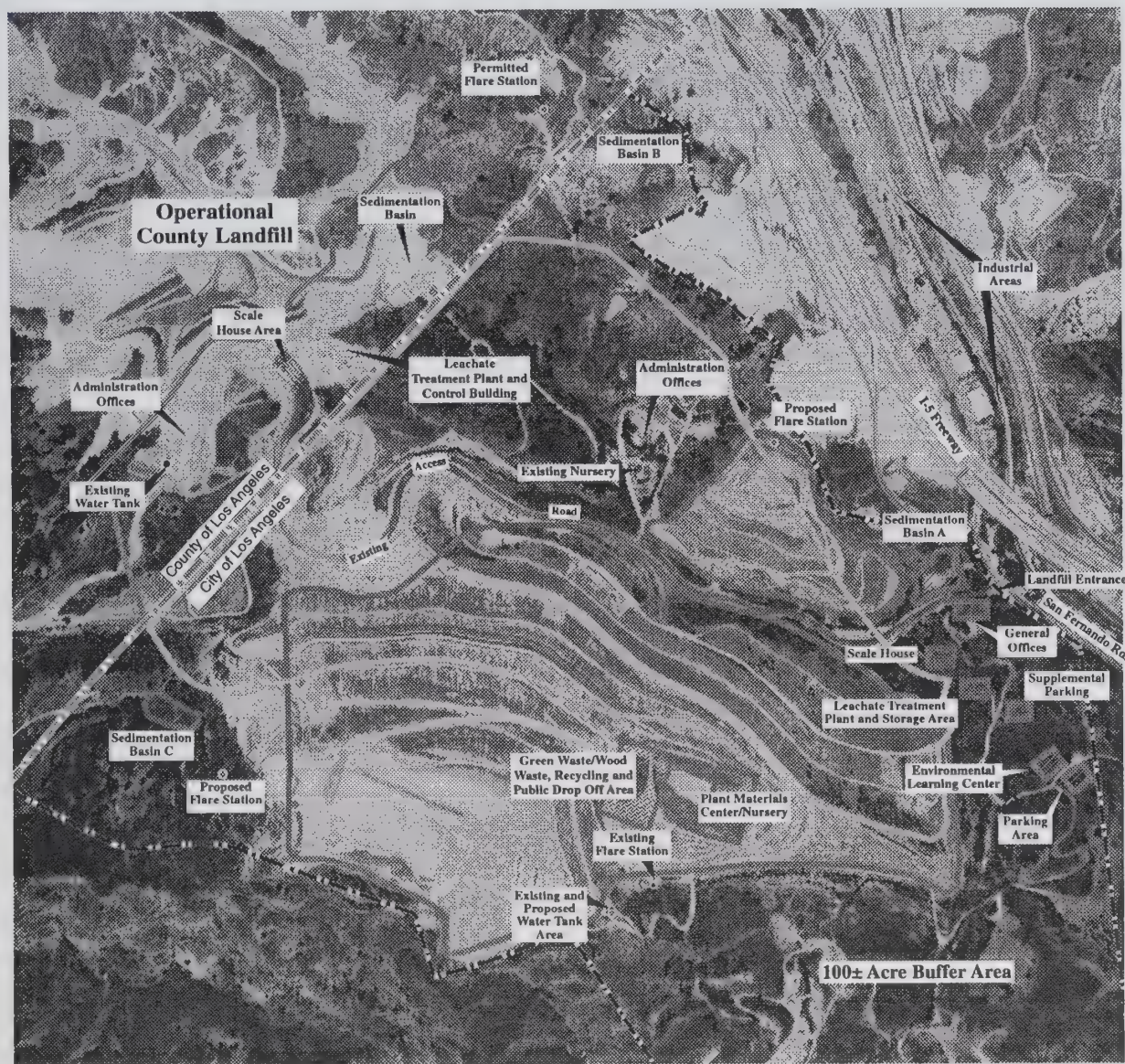
Source: I. K. Curtis Services, Inc.

ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED

Project Site and Surrounding Vicinity

RADIUS MAP
- Exhibit No. E-3

PLOT PLANS
- Exhibit No. E-4



Aerial photograph taken August 3, 1996

Proposed Uses within the Project Site and Operational County Landfill

Legend

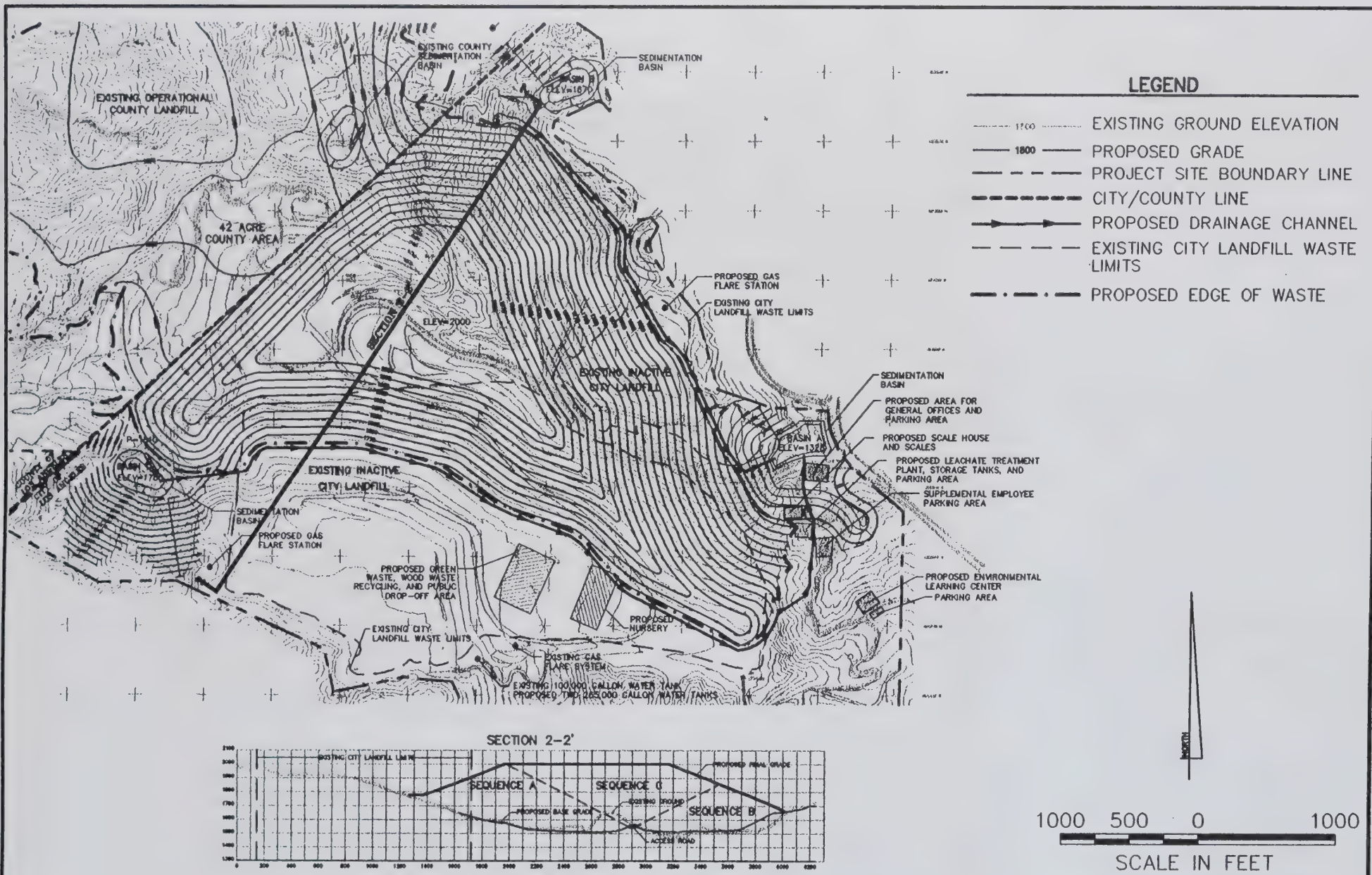
- Project Site Boundary
- County/City of Los Angeles Boundary
- Existing Inactive Landfill (2 fill areas)
- Proposed Landfill Footprint (194± acres)
- Proposed Landfill Area (42± acres)
- Proposed Ancillary Facilities/Areas in City

NOTE:
Operational County Landfill Footprint is ±215 acres.

Source: Inland Aerial Surveys, Inc.
Ultrasystems Environmental Incorporated



ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED



GeoSYNTEC CONSULTANTS

DISPOSAL AREA SEQUENCING SECTION 2-2
FINAL ELEVATIONS
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.

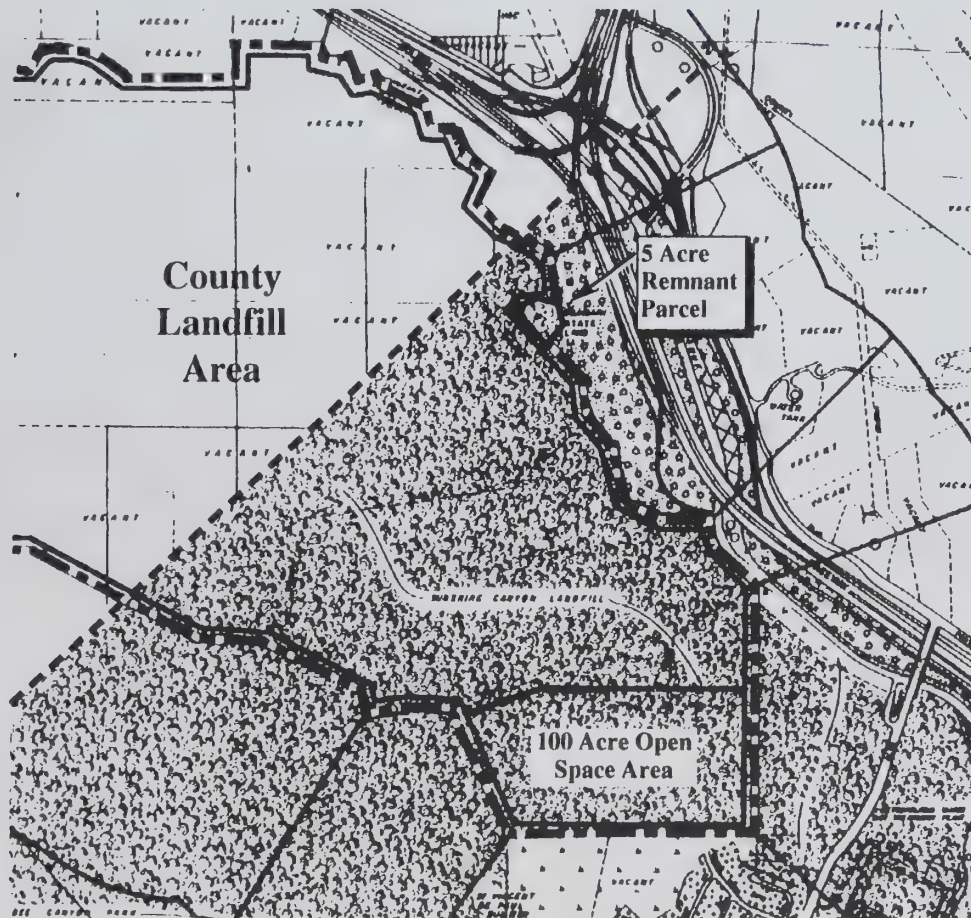
DATE:

15 JUNE 1998

EXHIBIT NO. E-4B

GENERAL PLAN MAPS

- EXHIBIT No. E-5

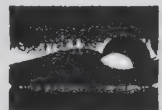
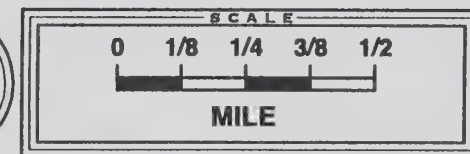


Legend

- Property Boundary
- City/County of Los Angeles Boundary
- Project Site Boundary

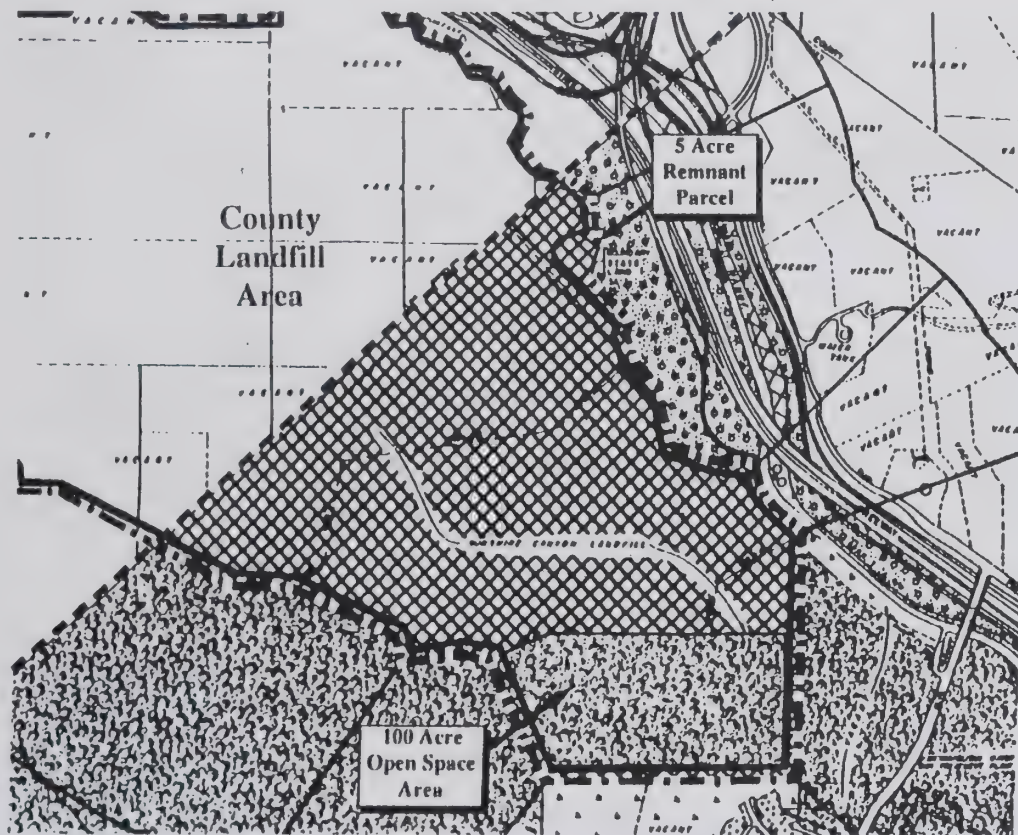
- Residential Minimum
- Residential Low
- Industrial Limited
- Open Space
- Public Facilities

Source: GC Mapping Service,
City of Los Angeles Planning Department



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INCORPORATED

Existing Granada Hills - Knollwood Community Plan Land Use Designations

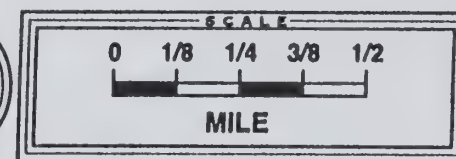


Legend

- Property Boundary
- City/County of Los Angeles Boundary
- Project Site Boundary

- Residential Minimum
- Residential Low
- Industrial Limited
- Open Space
- Public Facilities
- Heavy Industrial (Proposed)

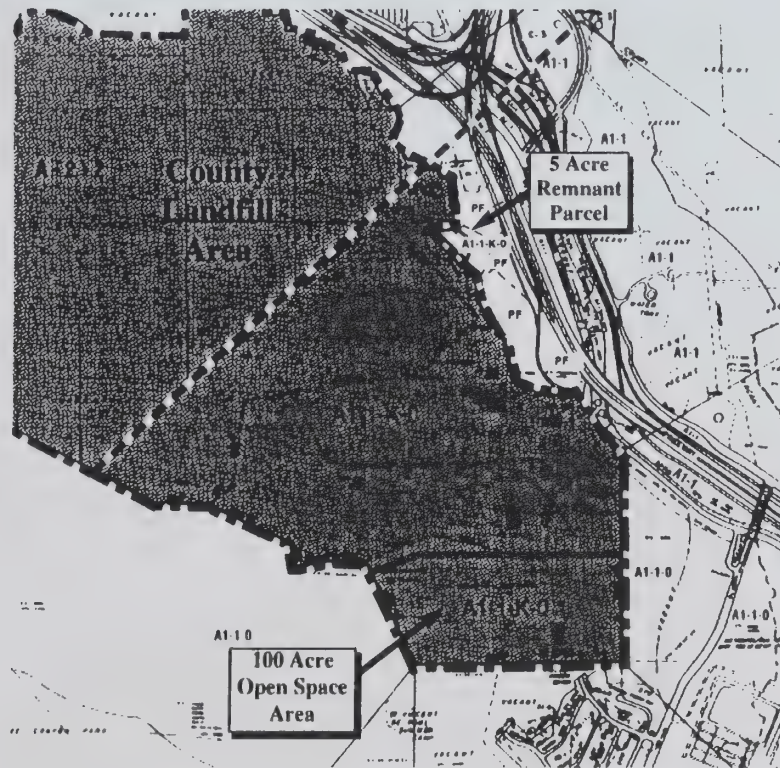
Source: GC Mapping Service.
City of Los Angeles Planning Department





Proposed Granada Hills - Knollwood Community Plan Land Use Designations

ZONING MAPS

- Exhibit No. E-6



Legend

-  Property Boundary
-  City/County of Los Angeles Boundary



Project Site Boundary

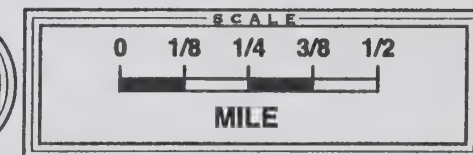
City of Los Angeles Zoning Designations:

- A1-1-K-0 Agricultural, Height District 1, Equine Keeping, Oil District Overlay
- RMP-1 Mobile Home Park
- RS-1 Suburban, 7,500 sq. ft. Minimum Lot Size

County of Los Angeles Zoning Designations:

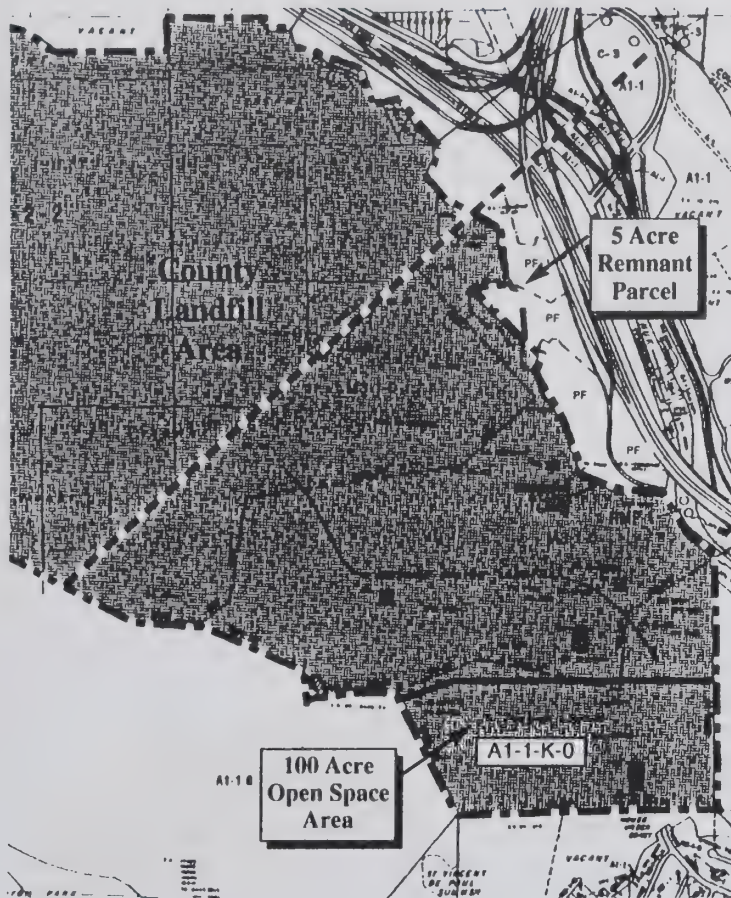
- A-2-1 Heavy Agricultural Zone, 1 Acre Minimum Lot Size
- A-2-2 Heavy Agricultural, 2 Acre Minimum Lot Size
- C-R-DP Commercial Recreation Development Program

Source: GC Mapping Service,
City of Los Angeles Planning Department






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INCORPORATED

Existing City and County Zoning Designations



Legend

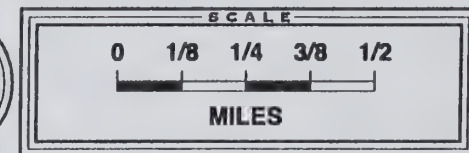
-  Property Boundary
-  City/County of Los Angeles Boundary
-  Project Site Boundary

City of Los Angeles Zoning Designations:

- M3-1-0 Heavy Industrial, Oil District Overlay
- A1-1-K-0 Agricultural, Height District 1, Equine Keeping, Oil District Overlay
- RMP-1 Mobile Home Park
- RS-1 Suburban, 7,500 sq. ft. Minimum Lot Size

County of Los Angeles Zoning Designations:

- A-2-1 Heavy Agricultural Zone, 1 Acre Minimum Lot Size
- A-2-2 Heavy Agricultural Zone, 2 Acre Minimum Lot Size
- C-R-DP Commercial Recreation Development Program



Source: GC Mapping Service, City of Los Angeles
Planning Department, County of Los Angeles
Department of Regional Planning



ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED

Proposed Zoning Map

SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

- Exhibit No. E-7

**SEIRs not transmitted
with this report.**

ADDENDUM

- Exhibit No. E-8

**ADDENDUM TO THE
FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
SUNSHINE CANYON LANDFILL**

**SEIR 91-0377-ZC/GPA
State Clearinghouse Number 92041053**

Lead Agency:

CITY OF LOS ANGELES
Department of City Planning
Environmental Review Section
221 North Figueroa Street, 15th Floor
Los Angeles, California 90012-2601

Project Proponent:

BROWNING-FERRIS INDUSTRIES OF CALIFORNIA, INC.
14747 San Fernando Road
Sylmar, California 91342

Environmental Consultant:

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED
6 Jenner, Suite 210
Irvine, California 92618

February 1999

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LIST OF APPENDICES

<u>Appendix</u>
A Assessor's Parcel Maps

1.0 INTRODUCTION

The City of Los Angeles (City) is evaluating a proposed project that would consist of the development, operation, maintenance, and monitoring of a Class III, nonhazardous solid waste landfill within the northern portion of the San Fernando Valley. A portion of the proposed City/County Landfill footprint is located on ±194 acres within the City portion of Sunshine Canyon and provides an estimated net airspace disposal capacity of 55 million tons within the City. The regional geographical setting of the project is depicted on **Figure 1**.

This Addendum has been prepared to address the addition of an adjacent ±5-acre remnant parcel to the project proponent's GPA/ZC request. Specifically, the request is to change the Open Space General Plan designation and A1-1-K-O zoning to Heavy Industrial land use designation and M-3 zoning.

The project proponent has also requested that the ±100-acre open space area located south of the proposed City/County Landfill be deleted from the GPA/ZC request area, which would allow the retention of its current Open Space land use designation and A1-1-K-O zoning. Therefore, the result of these two actions is that there will be a decrease of approximately 95 acres in proposed industrial lands.

Following completion and circulation of the *Final Subsequent Environmental Impact Report, Sunshine Canyon Landfill*, State Clearinghouse (SCH) Number 92041053 (Final SEIR) and the *Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill* (Draft SEIR) a question was raised regarding the distance of the proposed landfill footprint of the Sunshine Canyon City/County Landfill (Landfill) from more restrictive zoning; specifically, a landlocked piece of property zoned A1-1-K-O, located adjacent to the northeast corner of the City portion of the Landfill. This issue was addressed in the *Responses to Comments (October 29, 1998) Public Hearing on the General Plan Amendment/Zone Change for the Proposed Sunshine Canyon Landfill* (December 1998) document, Topical Issue 24, as follows:

An adjoining approximately ±5-acre remnant portion of Tract 9673, located northeast of the proposed landfill, is zoned A1-1-K-O and is not owned by the project proponent. The tract map for Tract 9673 was recorded by the City in 1927. According to title research, all of the lots in the tract were acquired by the State of California (by deeds and/or final orders of condemnation) in the 1960s for construction of the Golden (I-5) State Freeway. The latest Assessor's Parcel (AP) map available (AP Book 2601, page 4) shows that the I-5 Freeway completely enveloped the tract with all parcels tied together. In 1983, a Director's Deed from Caltrans was recorded indicating that the property was excess land and landlocked. This Deed recites the following on page 3:

There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway. The above-described real property is landlocked and without any direct access to the freeway or to any public or private road. The State of California is without obligation or liability to provide access to the said real property.

According to Chicago Title, the property has never been insured by a title company. Based on the amount of documentary transfer tax paid in 1983 (i.e., \$12.10), the consideration paid for this parcel is estimated at approximately \$11,000.

Given the landlocked nature of this remnant parcel, it does not meet the definition of a lot under Section 12.03 the Los Angeles Municipal Code. This property has remained vacant and unused since 1927 and cannot be developed. The purchaser of the subject property was provided full disclosure of its lack of access. The site has previously been graded and cleared of vegetation by Caltrans for maintenance activities

associated with the Golden State Freeway. To avoid creating a small island of A1-zoned property, one of the most restrictive zones, surrounded by industrial uses and M3-1-O and PF zoned property, the least restrictive zones, the property should be re-zoned to [Q]M3-1-O, as an "added area," in the pending zone change proceedings, with uses restricted to those permitted in adjoining property and with all other uses subject to review and approval by a Zoning Administrator.

At this time the project proponent is formally requesting that the remnant parcel be included in its request for a General Plan Amendment/Zone Change (GPA/ZC) from Open Space to Heavy Industrial. This parcel is currently zoned A-1-K-O. The "A1" indicates an agricultural zone, the "1" designates height district, the "K" designates an equine-keeping district and the "O" indicates an oil overlay area. The General Plan land use designation as shown on the Granada Hills-Knollwood Community Plan Map is Open Space.

In addition, after publication and circulation of the Draft SEIR and Final SEIR and in response to public comment, the project proponent has requested that the ± 100 -acre open space area located south of the proposed City/County Landfill be deleted from the GPA/ZC request area, reducing the area of the request from ± 494 acres to ± 394 acres allowing the retention of the area's current Open Space land use designation and A1-1-K-O zoning. This area is shown on **Figure 2** and on **Figure 3**.

Therefore, this Addendum has been prepared to more clearly describe the deletion of the 100-acre open space area and the addition of the ± 5 -acre remnant parcel to the project proponent's GPA/ZC request. These minor revisions do not represent a substantial change in the project description or raise new environmental issues and therefore they do not warrant changes or revisions to the Final SEIR. Section 4.0 contains an analysis of environmental impacts related to these minor changes in the General Plan Amendment/Zone Change request by the project proponent.

2.0 BACKGROUND

Requested Landfill Project

The proposed project is a regional major Class III nonhazardous solid waste landfill facility designed to serve waste streams within the Los Angeles region. The Landfill would be developed, owned, and operated by the project proponent. Ultimately, this proposed landfill facility would have a total airspace capacity of 90 million tons; receive, process, and dispose an average of 11,000 tpd of municipal solid waste and commercial and industrial wastes; and recycle certain waste materials. The maximum net tonnage that can be deposited per operating day is 12,100 tpd. The City portion of the landfill would have an estimated total airspace capacity of 55 million tons.

The project site area includes ± 494 acres in the City and ± 608 acres in the County. A total $\pm 1,102$ acres are owned by the project proponent in and around Sunshine Canyon. The proposed City/County Landfill footprint in the City will occupy ± 194 acres within the City and then extend onto ± 42 acres within the County and ultimately connect (vertically and horizontally) with the approved County Landfill, which encompasses ± 215 acres.

The operational site life is anticipated to be approximately 26 years, assuming that net intake rates presented above remain constant. These net rates do not include clean soil that may be imported for cover material, waste processed and used beneficially on the Landfill, separated waste, and/or waste otherwise diverted from the waste stream and exported from the Landfill and recycled.

Landfill ancillary facilities include portable trailer facilities for administrative office space; a trailer for onsite resident caretaker; an environmental learning center; a waste materials recycling area; a plant materials center (i.e., nursery); a leachate treatment plant and storage tanks; surface drainage systems; water storage tanks; gas monitoring stations; gas flare stations and other ancillary uses.

The proposed hours of operation are 6:00 a.m. (scales open) to 6:00 p.m. (scales close), Monday through Friday and 7:00 a.m. to 2:00 p.m. on Saturday. The Landfill entrance gates at San Fernando Road will be open at 5:00 a.m. on weekdays and 6:00 a.m. on Saturday to allow the onsite queuing of vehicles. Refuse cover, maintenance and related operations will be completed by 9:00 p.m. on weekdays and Saturday.

As discussed above, the proposed project would be a Class III nonhazardous landfill, which only accepts solid waste generated by residential and commercial uses. The landfill will not accept hazardous, toxic, radioactive, infectious or untreated medical or liquid wastes. To ensure that no hazardous waste is deposited, the project will include a waste load-checking program which will inspect hazardous wastes in a segregated area of the Landfill. If hazardous waste materials are discovered, required emergency actions will be taken. Signage would be located at the entrance of the facility specifically stating that the landfill would not accept any hazardous waste, and would indicate the location of permitted facilities where these materials can be properly disposed.

Existing Inactive City Landfill

The inactive Class III nonhazardous Landfill consists of two landfilled areas that encompass ± 205 acres and include a waste placement of approximately 25 million tons. The largest fill area is located within the southwest portion of the ± 494 acre project site (within City jurisdiction) and landfilling operations were ceased in September 1991 due to the expiration of a 25-year zoning variance. This main landfilled area encompasses ± 185 acres, and a smaller fill area encompasses ± 21 acres located directly north of the larger fill area and north of the access road.. Even though these inactive City landfilled areas are not physically connected, they share the same Solid Waste Facilities Permit. When operational, these areas shared ancillary facilities (i.e., scales, access road) and will continue to share environmental protection and control features during closure and postclosure maintenance.

Closure and postclosure maintenance and monitoring of these inactive landfill areas would be implemented during the mandated 30-year postclosure period pursuant to federal, state, regional and local regulatory rules and regulations. In response to these requirements, a *Final Closure and Postclosure Maintenance Plan for the Sunshine Canyon Sanitary Landfill* (FCPMP) was prepared by consulting engineers and submitted to regulatory agencies. Engineering and construction requirements contained in the FCPMP are intended to eliminate or significantly minimize potential environmental impacts associated with project implementation. Closure activities undertaken would be under the direct supervision of a registered civil engineer or a certified engineering geologist. These activities would include implementation of final grading plan; placement of final cover layer over the existing inactive City landfill; revegetation of the final cover layer; construction of surface water drainage controls; and construction of a sedimentation basin.

The environmental documentation (Mitigated Negative Declaration) for the FCPMP is currently under review by the City's Environmental Affairs Department. When a draft document is finalized it will be available for public review and sent to all responsible agencies (expected to be available for review in March 1999).

Located directly to the south of the existing inactive Landfill is a ± 100 acre open space area, which separates the City Landfill from residential areas in Granada Hills. Within this area, a voluntary tree-planting program was established by the project proponent, and a diverse variety of native and nonnative trees were planted.

Currently, over 11,000 trees have been planted, including 1,367 coast live oak trees. The majority of these trees exceed 15 feet in height. This program was designed to visually enhance the area with these plantings, blending plantings into the natural terrain of the area. Additionally, revegetation programs are underway to establish a native oak woodland community in this area, using native seed stock taken from within Sunshine Canyon and propagated at BFI's onsite nursery. This open space area also supports various uses (i.e., leased oil wells or associated facilities).

3.0 REQUEST FOR ZONE CHANGE AND GENERAL PLAN AMENDMENT

The proposed Landfill will require an amendment to the *Granada Hills-Knollwood Community Plan*, a component of the City of Los Angeles General Plan from "Open Space" to "Heavy Industrial." The existing Community Plan designations are shown on **Figure 4** and the requested Plan designations are shown on **Figure 6**.

Several objectives of the *Granada Hills-Knollwood Community Plan* would be achieved through designating an area to provide disposal capacity to meet the needs of the City's population and by preserving the ridgelines that surround the landfill. Some of these objectives include the following: to coordinate the development of the Granada Hills-Knollwood area with other parts of the City and the metropolitan area; to designate lands at appropriate locations for the various private uses and public facilities in the quantities and densities required to accommodate population and activities projected to the year 2010; to promote economic well-being and public convenience through the allocation and distribution of commercial lands for retail, service, and office facilities in quantities and patterns based on current planning principles and standards; to provide for the location and programming of public services and utilities and coordinate the phasing of public facilities with private development; and to encourage open space for recreation uses and promote the preservation of views, natural character, and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.

Previous variance approvals were granted by the City to permit landfilling operations and activities within the City portion of Sunshine Canyon for over 30 years. One such zoning variance (ZV) was granted in April 1966 and permitted the continued expansion and operation of the existing landfill for a period of 25 years. This ZV expired in September 1991, and at that time, the City Landfill ceased accepting waste.

Prior to project applications on the proposed City/County Landfill being filed, the project proponent's counsel held discussions with the City Zoning Administrator to determine the most appropriate course of action for project processing. At the direction of the City, the project proponent requested a GPA/ZC for its entire ±494 acre project site within City jurisdiction. The proposed GPA would change the land use from Open Space to Heavy Industrial and the ZC would change the zoning designation from A1-1-K-O to M3-1-O Heavy Industrial. The existing and requested zoning designations are shown on **Figure 5** and **Figure 7**, respectively.

As discussed herein, there is a ±100 acre open space area located directly to the south of the existing inactive City Landfill. This area has been eliminated by the project proponent from the pending request for a General Plan Amendment and Zone Change. Consequently, it will be maintained with the existing Open Space General Plan designation and A1-1-K-O zone. Therefore, the requested GPA/ZC covers a ±394 acre area of Sunshine Canyon owned by the project proponent within the City.

Under the City's PZC, § 12.20.37(I), the M3-1-O zone permits landfilling uses. As further provided under that section, "None of those uses which may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise, vibration and the like . . . shall be located nearer than 500 feet to a more restricted zone."

In this regard, as discussed above, there is a ± 5 -acre parcel that would be within 500 feet of the landfill footprint if not included in this GPA/ZC request.

Therefore, the project proponent has requested that the ± 5 -acre landlocked remnant parcel be included in the GPA/ZC request and changed from an Open Space designation and A1-1-K-O zoning to a Heavy Industrial designation and M3-1-O zoning. The City General Plan Advisory Board (GPAB) has recommended that the property be designated Heavy Industrial, but the project proponent has also asked for the zoning to be changed to M3-1-O. This will ensure consistency between the General Plan and zoning designations of the property and it will remove a more restrictive zone from an area that is within 500 feet from the proposed landfill footprint.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

Summary of Environmental Documentation

The *Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill*, State Clearinghouse Number 92041053 (Draft SEIR), was prepared for the purpose of analyzing the direct, indirect, and cumulative environmental effects associated with proposed City/County Landfill. There was an initial 90-day circulation period for the Draft SEIR (July 25 through October 31, 1997), initiated by City Planning to encourage public comment, which was later extended to 132 days due to a City Councilman's request.

On November 18, 1997, two sessions of the Key Group Meeting/Open House for the proposed Sunshine Canyon Landfill Project were held to explain the proposed Project in an open house/workshop format and to have technical experts answer questions pertaining to the Project. The *General Plan Amendment/Zone Change Report* responded to comments received during the Key Group Meeting/Open House, and to those comments received by the City between November 19 and December 5, 1997. This report was prepared in consistency with Los Angeles City Form CP-7749 "Major Plan Review Key Group Input."

The *Final Subsequent Environmental Impact Report, Sunshine Canyon Landfill*, State Clearinghouse Number 92041053 (Final SEIR), was prepared for the purpose of incorporating all public and agency comments received on the *Draft Subsequent Environmental Impact Report* (Draft SEIR) in accordance with the *Guidelines for the Implementation of the California Environmental Quality Act* (State CEQA Guidelines).

This section is an analysis of environmental impacts related to changes in the project proponent's General Plan Amendment/Zone Change request. As previously discussed, these changes involve the elimination of the ± 100 acre open space area from the GPA/ZC request and the addition of a ± 5 -acre parcel adjacent to the northeast corner of the proposed landfill to be consistent with the requested industrial zone and land use designation for the project site.

Although the revised GPA/ZC request would add a ± 5 -acre parcel to the industrial designation, it would not significantly change any aspects of the project description or proposed uses. In addition, with the ± 100 acre open space area being eliminated from the requested GPA/ZC, the net result is a decrease of approximately 95 acres in proposed industrial lands. Also, given the landlocked nature of the remnant parcel, it does not meet the definition of a lot under the Los Angeles Municipal Code. Moreover, the property owner to the east of this parcel (State of California) has recorded a Director's Deed stating that it is without obligation or liability to provide access to the property. Therefore, the property cannot be developed at this time and such development is not reasonably foreseeable.

Due to the reasons given above, no revisions are necessary to any of the following topical issues discussed in the Draft SEIR or Final SEIR due to the minor changes in the GPA/ZC request:

- ▶ **Earth Resources** - The action will not result in any additional grading activities or exposure of additional persons or property to geologic hazards.
- ▶ **Air Quality** - The action will not result in any additional grading, additional vehicles or any other uses resulting in an increase of harmful emissions.
- ▶ **Surface and Groundwater** - The proposed GPA/ZC request would not alter the direction or flow of surface waters or result in potential contamination of surface or groundwaters.
- ▶ **Biological Resources** - The action will result in the retention of a ± 100 acre area as open space. The change in designation of the ± 5 -acre remnant parcel would not affect biological resources due the existing disturbed nature of the property and the fact that no development of the property is reasonably foreseeable at this time.
- ▶ **Noise** - The action will not result in any activities that would increase the existing ambient noise levels.
- ▶ **Light and Glare** - The action will not result in any activities that would involve construction of new light sources or in any way add to light and glare impacts.
- ▶ **Land Use** -. Although it is not reasonably foreseeable that the ± 5 -acre parcel would ever be developed with any land use due to the fact that there is no access and it is by definition no longer a lot, the proposed GPA/ZC request which calls for M3-1-O zoning along with the Heavy Industrial designation recommended by the GPAB, will ensure that there are no land use conflicts between the project site and adjacent properties, and that there is consistency between the General Plan and Zoning of the subject ± 5 -acre parcel as required by State law.
- ▶ **Natural Resources** - The action will not result in any activities that would result in the use of additional fuel, water, energy or other natural resources.
- ▶ **Risk of Upset** - The action will not result in any activities that would result in the application, use, collection or disposal of potentially hazardous materials or pose a threat to the public or employees through the release of such materials.
- ▶ **Population** - No increase in population would occur due to changes in the GPA/ZC request.
- ▶ **Housing** - The action would not result in the need for additional housing or result in any negative impacts on surrounding residential properties.
- ▶ **Transportation and Circulation** - The action will not result in any activities that would cause any increase in traffic or other impacts on the circulation system.
- ▶ **Public Services** - The action will not result in any activities that would cause any additional need for expanded public services (i.e., police, fire, emergency medical response, etc.).
- ▶ **Utilities** - The action will not result in any activities that would cause any additional need or expansion of utility services.

- ▶ **Aesthetics/View** - Since the ±5-acre remnant parcel is largely devoid of vegetation and no development is proposed for the site at this time, no impacts to visual quality would occur as a result of this action. The elimination of the ±100 acre area from the GPA/ZC request will ensure the continuation of aesthetic improvements to this area.
- ▶ **Cultural Resources** - The action will not result in any activities that would cause disturbance or damage of cultural resources.

5.0 CONCLUSIONS

This Addendum to the Final SEIR has been prepared to address the addition of an adjacent ±5-acre landlocked remnant parcel to the pending GPA/ZC request as an "added area" pursuant to the Municipal Code. Specifically, the request is to change the Open Space designation and A1-1-K-O zoning to a Heavy Industrial land use designation and M3-1-O zone. This will avoid creating a small island of A1-zoned property, one of the most restrictive zones, surrounded by industrial uses and M3-1-O and PF zoned property, the least restrictive zones. It will also ensure that there is consistency between the City's General Plan and zoning of the property, as required by State law.

The project proponent has also requested that the ±100-acre open space area located south of the proposed City/County Landfill be deleted from the GPA/ZC request area, which would allow the retention of its current Open Space land use designation and A1-1-K-O zoning. Therefore, the result of these two actions is that there will be a decrease of approximately ±95 acres in proposed industrial land.

These actions will avoid unnecessary incompatibility between adjacent zoning designation; and will ensure that the ±100 acre open space area will remain open space.

Since the request does not involve any additional development or changes in the project description, there will be no additional impacts beyond those discussed in the Draft and Final SEIR.

6.0 FIGURES

The following Figures 1-7 accompany the descriptions provided within this document.



Source: Ultrasystems Environmental Incorporated
Base Map: Automobile Club of Southern California



ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED

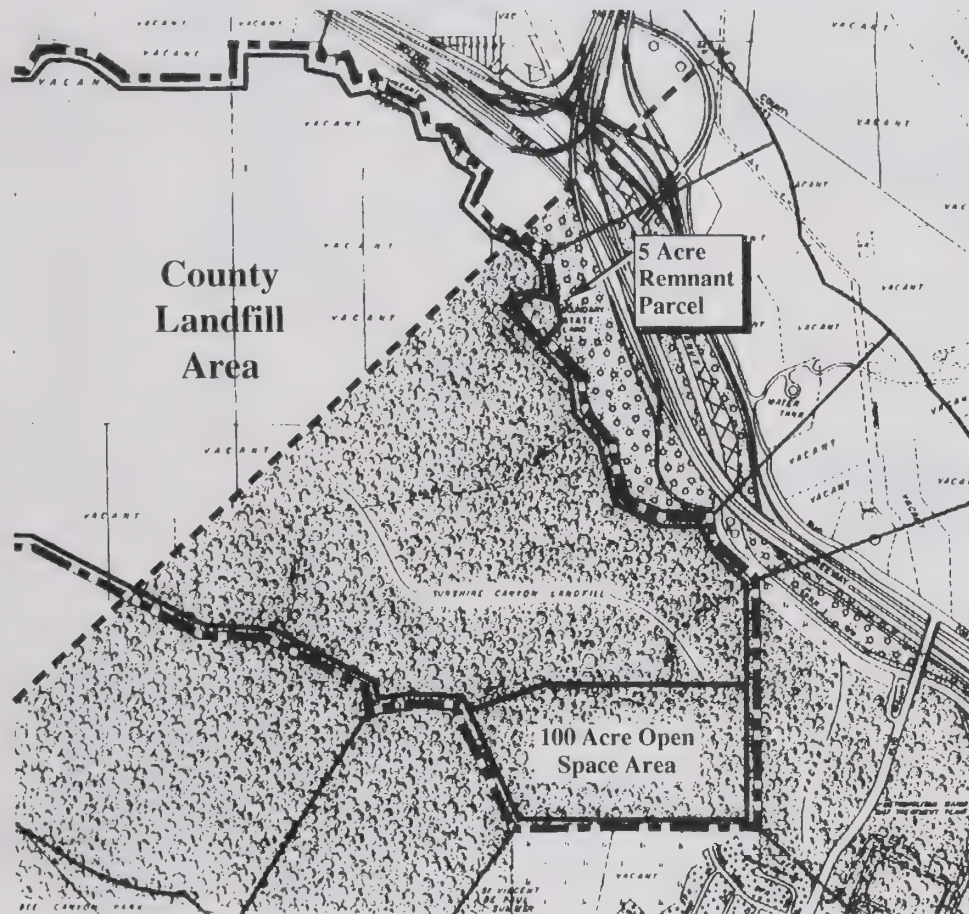
Regional Location Map

FIGURE

1

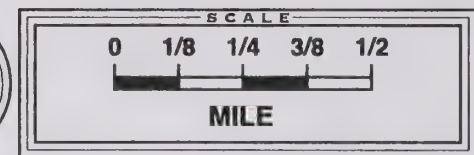


3



- ### Legend
- Property Boundary
 - City/County of Los Angeles Boundary
 - Project Site Boundary

- Residential Minimum
- Residential Low
- Industrial Limited
- Open Space
- Public Facilities



Source: GC Mapping Service,
City of Los Angeles Planning Department

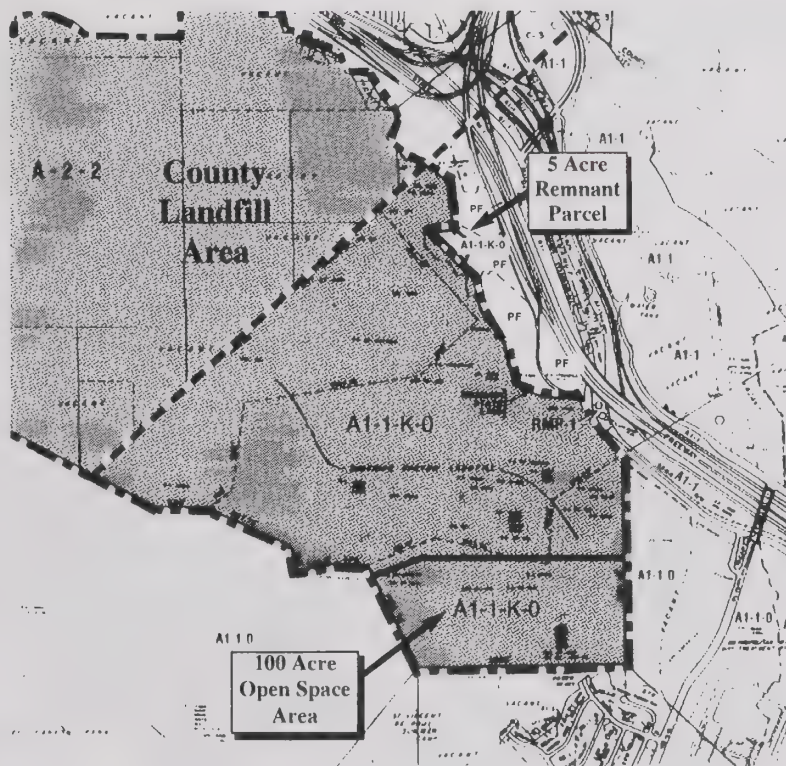


ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED

Existing Granada Hills - Knollwood Community Plan Land Use Designations

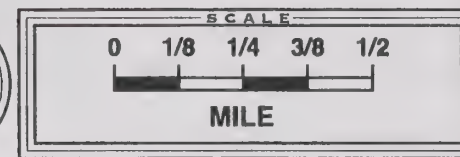
FIGURE

4



Source: GC Mapping Service,
City of Los Angeles Planning Department

- ### Legend
- Property Boundary
 - City/County of Los Angeles Boundary
 - Project Site Boundary
- City of Los Angeles Zoning Designations:**
- A1-1-K-0 Agricultural, Height District 1, Equine Keeping, Oil District Overlay
 - RMP-1 Mobile Home Park
 - RS-1 Suburban, 7,500 sq. ft. Minimum Lot Size
- County of Los Angeles Zoning Designations:**
- A-2-1 Heavy Agricultural Zone, 1 Acre Minimum Lot Size
 - A-2-2 Heavy Agricultural, 2 Acre Minimum Lot Size
 - C-R-DP Commercial Recreation Development Program

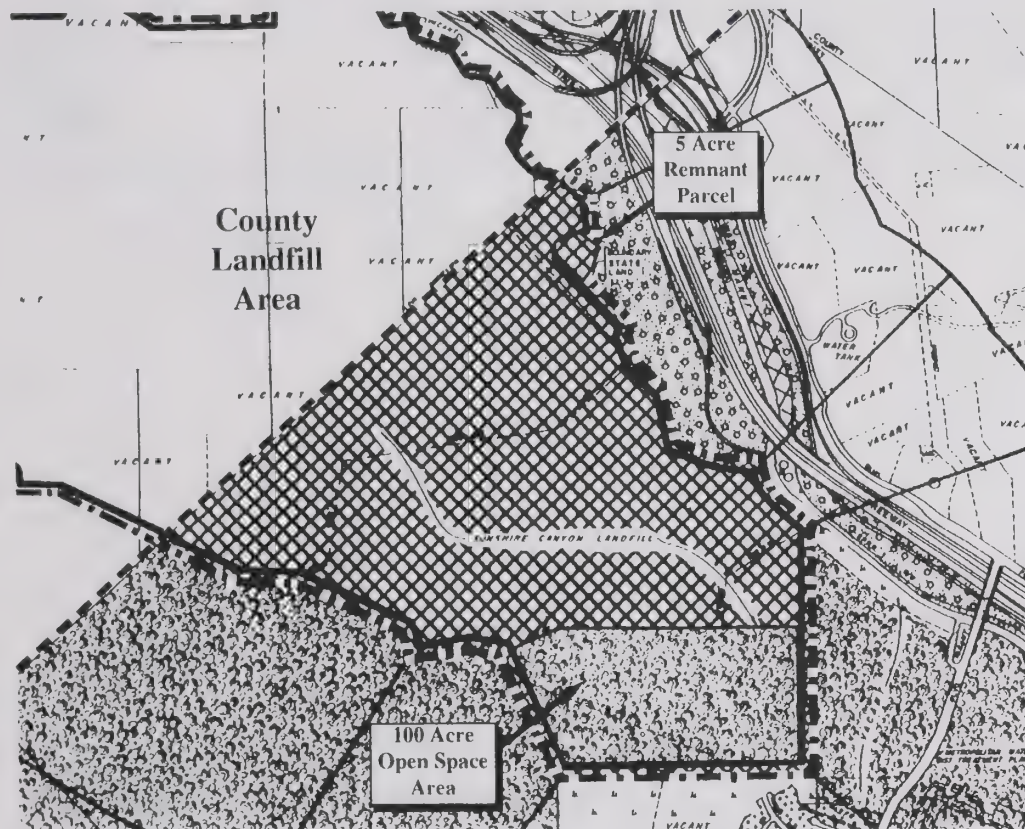


ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED




Existing City and County Zoning Designations


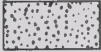


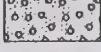

FIGURE

5

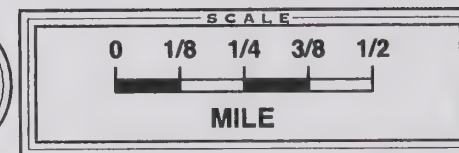


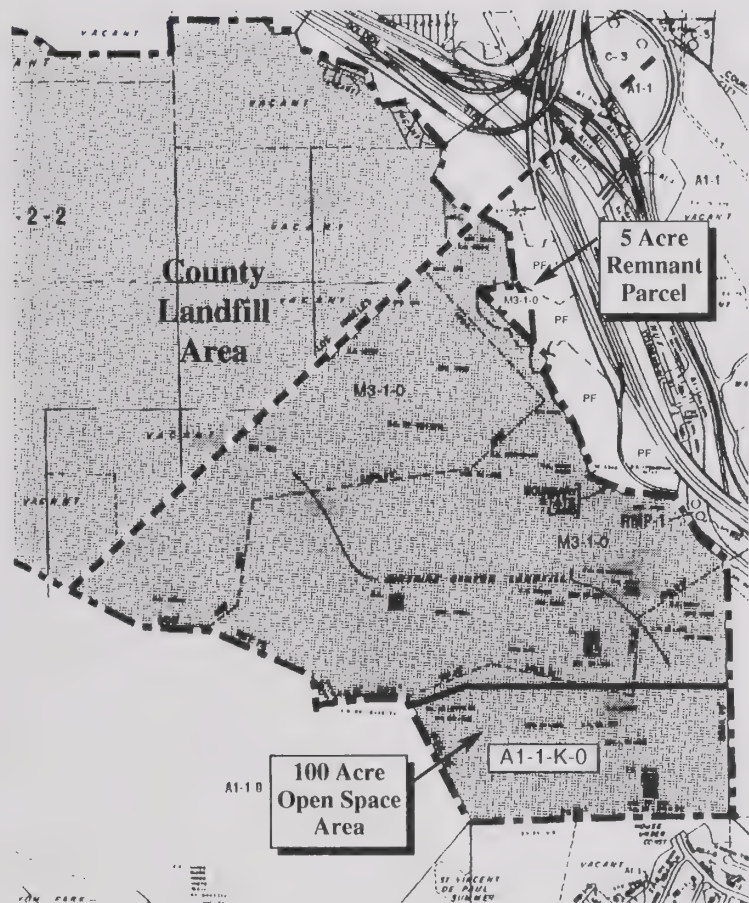
Legend

-  Property Boundary
-  City/County of Los Angeles Boundary
-  Project Site Boundary




-  Residential Minimum
-  Residential Low
-  Industrial Limited
-  Open Space
-  Public Facilities
-  Heavy Industrial (Proposed)

Source: GC Mapping Service,
City of Los Angeles Planning Department





Legend

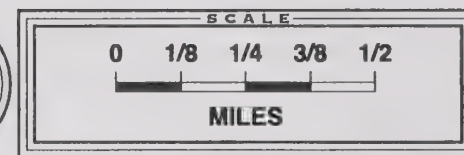
-  Property Boundary
-  City/County of Los Angeles Boundary
-  Project Site Boundary

City of Los Angeles Zoning Designations:

- M3-1-0 Heavy Industrial, Oil District Overlay
- A1-1-K-0 Agricultural, Height District 1, Equine Keeping, Oil District Overlay
- RMP-1 Mobile Home Park
- RS-1 Suburban, 7,500 sq. ft. Minimum Lot Size

County of Los Angeles Zoning Designations:

- A-2-1 Heavy Agricultural Zone, 1 Acre Minimum Lot Size
- A-2-2 Heavy Agricultural Zone, 2 Acre Minimum Lot Size
- C-R-DP Commercial Recreation Development Program



Source: GC Mapping Service, City of Los Angeles
Planning Department, County of Los Angeles
Department of Regional Planning



ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED

Requested Zoning Map

FIGURE

7

Appendix A
Assessor's Parcel Maps

2601 O-I
SCALE 1" = 1500'

TAX AREA CODE
16
1698

1995

117 OF LOS ANGELES

(1) TAX DIST. NO. 1

(5) ROAD DIST. NO. 5

ALL IN
LOS ANGELES UNIFIED SCHOOL
LOS ANGELES CITY COMMUNITY COLLEGE
SO. CALIF. RAPID TRANSIT DIST.
L.A. CO. FLOOD CONTROL DIST.
NORTHWESTERN L.A. RESOURCE CONSERVATION DIST.
LACO FIRE-F&FW

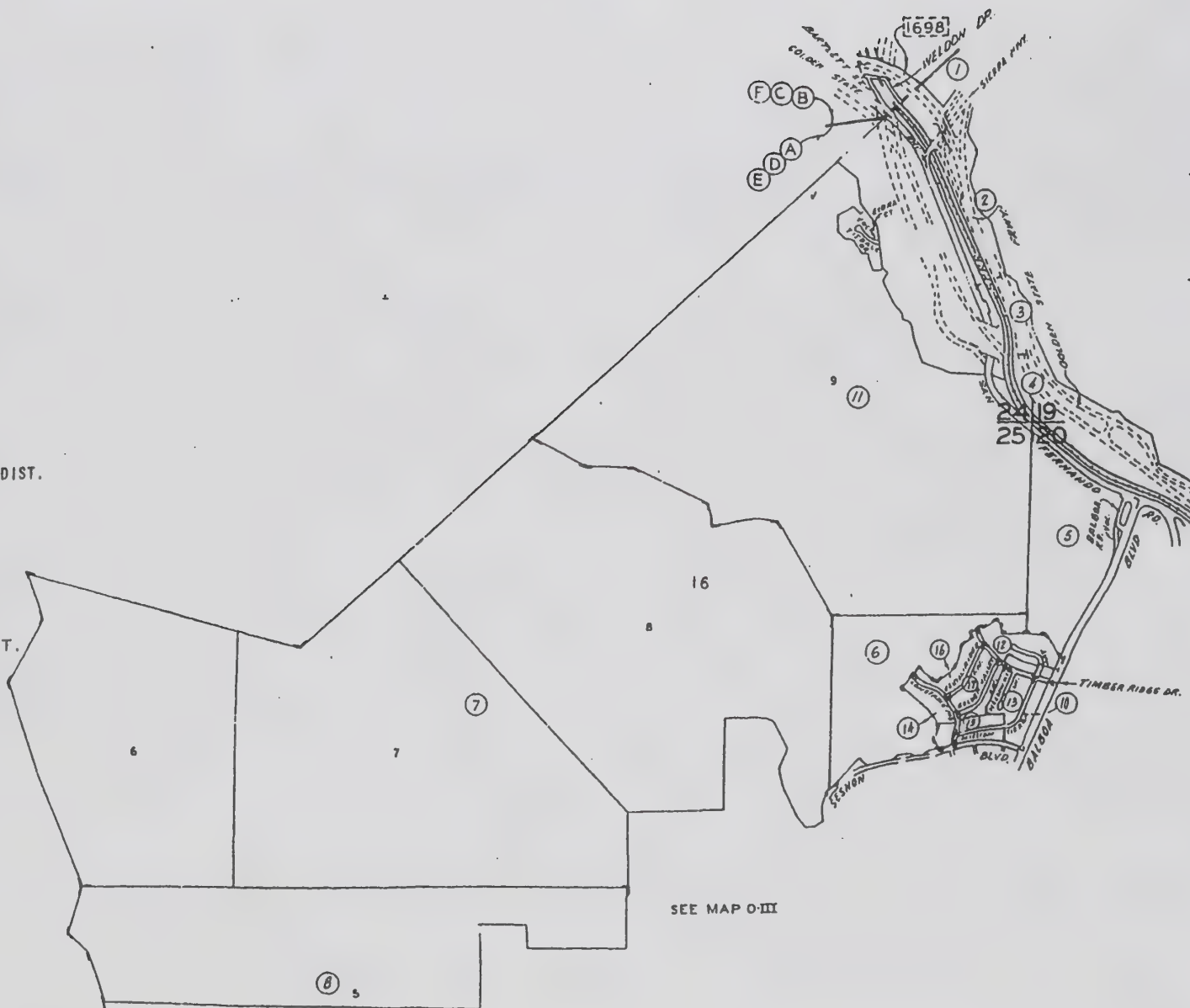
C L.A. CO. PUBLIC LIBRARY

D METROPOLITAN WATER DIST.

E GREATER L.A. CO. VECTOR CONTROL DIST.
95 NAME CHANGE

F CONSOLIDATED FIRE PROTECTION DIST.
OF L.A. CO. - 93 ANNEX 3-91

G GREATER L.A. CO. VECTOR CONTROL DIST.
95 NAME CHANGE (91 ANNEX)



SEE MAP O-III

SEE INDEX MAP O-II

CODE INDEX
BOOK 2601

MITIGATION MONITORING AND REPORTING PROGRAM

- Exhibit No. E-9

MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES (Based on Table 7.4-1 (Revised) Final SEIR 91-0377-ZC/GPA)

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.1 EARTH RESOURCES			
4.1.1 Grading Activities			
1. All grading activities shall be performed in accordance with the provisions of Division 70 of the City of Los Angeles Building Regulations, CCR Title 14, and with the rules and regulations as established by the City Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
2. Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for the development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the Department of Building and Safety shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the project proponent and independently evaluated by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
3. During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled onsite for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e., 50-100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14 a certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated unless performed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
4. Grading that allows for construction of ancillary facilities outside of the landfill footprint or that has the potential to impact property beyond the boundary of the landfill shall be approved by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, and City B&S
5. All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed project, including provisions for excavation approved by the Department of Building and Safety, City Engineer, City LEA and other Responsible Agencies.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
6. Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with the approved revegetation plan as approved by the City Building and Safety Department. Interceptor ditches	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, and City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, and City LEA, and City B&S

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
shall be designed to divert storm runoff to a sedimentation basin.			
7. Prior to the initiation of grading activities, the project proponent shall undertake, if necessary, reabandonment procedures as required by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: California Dept. of Conservation Enforcement Agency: California Dept. of Conservation
4.1.2 Geologic Hazards - Mudflow and Landslide (including lithologic history)			
8. When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled onsite for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
9. Areas of excavation and areas of loose soil (i.e., around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
4.1.3 Geologic Hazards - Subsidence			
Refer to Section 4.1.2, Geologic Hazards - Mudflow and Landslide.			
4.1.4 Geologic Hazards - Seismicity			
10. The landfill facility shall be designed and constructed to meet CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the project proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states "new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . ." The landfill design and seismic analysis will be reviewed by the RWQCB.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
11. An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter Scale or greater near the project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered structures shall be based on the results of the detailed stability analyses of potential seismic events.	Project Proponent	After earthquake events of 5.0 magnitude or greater.	Monitoring Agency: SCAQMD, LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: SCAQMD, LARWQCB, CIWMB, City B&S, City LEA, and City BOE
4.1.5 Geologic Hazards - Liquefaction			
12. Alluvium in the canyon bottoms beneath the footprint of the waste containment system	Project	Prior to commencement of landfill	Monitoring Agency: LARWQCB, CIWMB, City B&S,

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify that all alluvium within the landfill footprint has been removed prior to placement of any compacted fill or construction of any containment system elements.	Proponent	development.	Enforcement Agency: and City BOE LARWQCB, CIWMB, City B&S, and City BOE
13. The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction related impacts.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
14. The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
4.1.6 Geologic Hazards - Slope Stability			
15. Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
16. Final cut and fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
17. Final slopes shall be engineered to have a static factor of safety of at least 1.5.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
18. Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City Local Enforcement Agency (LEA).	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
4.2 AIR QUALITY			
4.2.1 Existing Conditions			
Refer to Section 4.2.11, Construction, within this table.			
4.2.2 California's SCAB Regional Climatic Characteristics			
Refer to Section 4.2.11, Construction, within this table.			
4.2.3 Criteria Air Pollutants			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Refer to Section 4.2.11, Construction, within this table.			
4.2.4 Ambient Air Quality Standards and Annual Statistics Refer to Section 4.2.11, Construction, within this table.			
4.2.5 Air Quality Management Plan Refer to Section 4.2.11, Construction, within this table.			
4.2.6 Proposed Project Overview Refer to Section 4.2.11, Construction, within this table.			
4.2.7 Site Preparation/Construction Phase Refer to Section 4.2.11, Construction, within this table.			
4.2.8 Air Quality Operational Phase (Long-Term) No mitigation measures would be required.			
4.2.9 Health Risk Analysis Refer to Section 4.2. 12, Operations, within this table.			
4.2.10 Project Consistency with Applicable Plans Refer to Section 4.2. 12, Operations, within this table.			
4.2.11 Construction 19. The following mitigation measures will reduce emissions to the maximum extent reasonably feasible. a. The project proponent will maintain equipment in tune per manufacturer's specifications. b. The project proponent will use catalytic converters on gasoline-powered equipment. c. The project proponent will retard diesel engine injection timing by 2 degrees. d. High-pressure fuel injectors will be installed. e. Heavy equipment will use reformulated, low-emission diesel fuel. f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. g. Where applicable, equipment will not be left idling for prolonged periods. h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	During project construction.	Monitoring Agency: City B&S Enforcement Agency: City B&S Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
20. Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and control is required.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD
21. Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed	Project Proponent	During project construction.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.			
22. Graded areas shall be watered as necessary to reduce dust emissions.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD
23. Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD
4.2.12 Operations			
24. <u>Construction Equipment</u> a. The project proponent will maintain equipment in tune per manufacturer's specifications. b. The project proponent will use catalytic converters on gasoline-powered equipment. c. The project proponent will retard diesel engine injection timing by 2 degrees. d. High-pressure fuel injectors will be installed. e. Heavy equipment will use reformulated, low-emission diesel fuel. f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. g. Where applicable, equipment will not be left idling for prolonged periods.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
25. <u>Refuse Trucks</u> The following measures will be applied to the project proponent's operated trucks that utilize the project site. a. Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
b. Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
c. Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
d. The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
e. When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
f. Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
26. <u>Truck Travel and Fugitive Dust Emissions</u>			
a. To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
b. Curbs and gutters shall be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
c. For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill. (Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion, TRC Environmental Solutions, Inc., May 2, 1997).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
d. For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Project Site Manager, SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
27. <u>Heavy Equipment Operations</u>			
a. Operations shall be restricted to encompass no more than a 10-acre active working face area.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
b. The disturbed area (subject to the surface erosion) shall be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
28. <u>Site Erosion</u>			
a. To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
b. Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, , and City LEA Enforcement Agency: CIWMB, and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
c. A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
d. An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.2.13 Odor Impacts			
29. The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
30. Operational techniques shall be utilized to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
31. Solid waste shall be compacted within 1 hour of its arrival at the working face.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City LEA Enforcement Agency: City LEA
32. The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
33. If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
34. To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include: a. <u>Sample Probe Installation</u> : One monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils. b. <u>Integrated Landfill Surface Sampling</u> : The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm. c. <u>Ambient Air Samples</u> : 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
<p>d. <u>Instantaneous Landfill Surface Monitoring</u>: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.</p> <p>e. <u>Regular Monitoring and Annual Testing</u>: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.</p>			
35. Flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Local Enforcement Agency. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
<p>4.3 SURFACE AND GROUNDWATER</p> <p>4.3.1 Surface Water</p>			
36. To ensure that infiltration of surface water into the closed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the project site entrance.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
37. As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. Onsite drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
38. Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage facilities consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff. Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into Sedimentation Basin A. Diversion ditches shall convey surface runoff from the undisturbed areas to the permanent perimeter ditches for safe transport around the landfill footprint. Surface covers of various types, from mulches to vegetation, shall be used to retard erosion from areas of disturbance. In addition, areas of disturbance shall be kept at a minimum during active filling operations.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
39. As filling operations progress upward in elevation and laterally across the canyon, both permanent and temporary drainage facilities shall be used to provide appropriate drainage protection. The lower elevation portions of the landfill working face shall be placed under final cover as soon as final grade is attained, and bench ditches shall be installed that will connect to adjacent, permanent perimeter ditches. These ditches	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
shall connect directly to the temporary diversion drainage ditches that will protect the active landfill areas from natural surface runoff.			
40. In order to monitor the effectiveness of those measures designed to prevent pollution from entering the offsite stormwater system, the project proponent shall be required to apply for coverage under the SWRCB's General Construction Activities Stormwater Permit Programs.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
41. The surface water collection system shall be designed to collect runoff and collect/retain suspended solids. Water leaving the sedimentation basins shall be monitored in accordance with NPDES requirements.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
42. Surface water quality shall be monitored by collecting water samples from the sedimentation basins to ensure that water quality protection standards (contaminant levels) as determined for the site by the LARWQCB are not exceeded.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
43. Sediment shall be cleaned out of the sedimentation basins after every significant storm.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
44. The final landfill cover shall be compacted and graded with a minimum 3-percent gradient to preclude percolation of rainwater and direct surface water runoff away from the landfilled refuse and into drains that ultimately discharge into the monitored sedimentation basins.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE.
45. An erosion control plan would be implemented by the project proponent to prevent stormwater pollution from construction activity. Construction materials, equipments and vehicles would be stored or parked in areas protected from stormwater runoff. Construction material loading and unloading would be in designated areas to minimize any washout due to stormwater runoff. Pre-construction controls would be implemented to include the use of a sandbagging system, including sandbag check dams and sandbag desilting basins, which would be used to limit runoff velocities and minimize sediment in stormwater runoff.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB and City BOE.
46. A preventive maintenance program would be implemented by the project proponent, including inspection of facility equipment, systems, and stormwater management devices to detect conditions that may cause breakdowns or failures resulting in discharge of materials into stormwater. This program applies to the onsite drainage ditches; rip-rap; berms and dikes; dust control; silt fences; diversion grading; and pavement surfaces. Each system and piece of equipment would be inspected monthly. Procedures for inspection would vary, due to the piece of equipment or system. However, the major elements of the inspection program would include checking for cracks or structural failures, inspecting parts or pieces of equipment nonfunctioning, checking for the degradation or deterioration of operating units, and investigating the need for cleaning or emptying units.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE.
4.3.2 Groundwater			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
<p>47. In compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, § 258.40 (Design Criteria), the proposed City/County Landfill shall install a composite liner system consisting of two components: (1) the upper component shall consist of a minimum 30-mil flexible membrane liner (FML) and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is utilized, it shall be at least 60 mils thick. If a thinner soil barrier layer of lower permeability is utilized, it shall have equal or superior containment capability. The FML component shall be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill shall have a LCRS that shall consist of either a granular layer 1-foot minimum in thickness or a geosynthetic alternative with an equivalent flow capacity, and a minimum 2-foot thick protective soil cover over which refuse will be placed. There shall also be a protective toe berm at the landfill terminus.</p>	Project Proponent	Prior to commencement of landfill development.	<p>Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB</p>
<p>48. In accordance with RCRA Subtitle D, 40 CFR, Part 258, the composite liner system shall be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system that shall be constructed shall be described in detail in the project proponent's ROWD for the landfill facility. The liner systems shall be constructed and field tested in accordance with strict Quality Assurance/Quality Control (QA/QC) procedures pursuant to criteria submitted to and approved by the LARWQCB prior to construction.</p>	Project Proponent	Prior to commencement of landfill development.	<p>Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB</p>
<p>49. Areas of natural groundwater seepage shall be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains shall be placed in areas where seeps and springs have been identified, and they shall collect and convey any water from these sources to the sedimentation basin. In the event any chemical constituents are in the seep water, the seep waters will be sampled, analyzed, collected, and then sent either to the onsite leachate treatment facility or offsite for proper treatment and disposal. The nature and the source of the seep would be investigated including additional sampling and laboratory testing.</p>	Project Proponent	Prior to commencement of landfill development.	<p>Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB</p>
<p>50. The LCRS shall be installed at the base and side slopes of the landfill. This system shall be designed and installed to collect generated leachate for disposal consistent with LARWQCB requirements. The collection system shall consist of a filter rock blanket embedded with a system of collection pipes or a geosynthetic alternative that collects and transports the fluid to a holding tank. In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the collection systems shall be designed to limit the hydraulic head on the liner to less than 12 inches. Collection pipes shall be sized and spaced to reduce the hydraulic head in the leachate collection system as specified in WDRs. Leachate shall be recovered and treated onsite. The treated leachate shall be sampled on a regular basis to affirm suitability for reuse onsite.</p>	Project Proponent	Prior to commencement of landfill development.	<p>Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB</p>
<p>51. Final design and operating conditions for the leachate removal and treatment system shall be as specified by the LARWQCB in the proposed landfill's WDRs. The LCRS shall be designed and installed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 4, § 2543 (Leachate Collection and Removal Systems), which requires that the LCRS be designed, constructed, maintained, and operated in a manner that collects</p>	Project Proponent	Prior to commencement of landfill development.	<p>Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB</p>

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
and removes twice the maximum anticipated daily volume of leachate from the waste management unit.			
52. A gas collection layer shall be placed beneath the liner system where it overlies the existing inactive landfill to mitigate the potential for LFG migration.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: SCAQMD, LARWQCB, CIWMB, and City LEA Enforcement Agency: SCAQMD and LARWQCB
53. The existing groundwater monitoring wells located within the City portion of Sunshine Canyon shall continue to be monitored during the development of the proposed project. The monitoring system may be revised as construction progresses in the areas where wells are located as approved by the LARWQCB.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
54. A preliminary closure/postclosure plan shall be provided as part of the operating permit for the landfill. Closure regulations are contained in the CCR, Title 23, Division 3, Chapter 15, Article 8 (Closure and Postclosure Maintenance), § 2580 (General Closure Requirements) et seq. Completion of landfilling operations will occur once final approved elevations are reached.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
55. The design, operation, and final closure of the landfill project shall be monitored by the City LEA, CIWMB, and LARWQCB to ensure that the landfill will not create significant environmental impacts to local or regional water supplies.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
56. Application of daily, intermediate, and final covers in accordance with applicable regulatory requirements shall aid to restrict leachate formation by inhibiting the infiltration of water into the landfill waste prism.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
57. Dust control water shall be applied to wet only the upper soil surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
58. The project shall be operated as a Class III landfill and shall not accept hazardous materials or liquid waste. Further restrictions will be identified in the future WDRs required prior to project development.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
59. Underground diesel fuel storage tanks will be installed, monitored and inspected in compliance with CCR Title 23, Division 3, Chapters 16 and 17 and City of Los Angeles Municipal Code Sections 57.31.34 through 57.39.18. Underground tanks would be double-walled and have sufficient secondary containment and a leak interception and detection system to prevent fluid migration.		Throughout landfill operations.	Monitoring Agency: LAFD and City LEA Enforcement Agency: LAFD
4.3.3 Flood Hazard/ Mudflow Hazard			
Refer to Section 4.3.1, Surface Water within this table.			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.4 BIOLOGICAL RESOURCES 4.4.1 Vegetation and Wildlife Habitat <u>Venturan Coastal Sage Scrub</u> 60. A detailed conceptual mitigation plan shall be prepared by the project proponent and contain specific information on planting, maintenance, and monitoring. A revegetation plan, that includes Coastal sage scrub restoration can feasibly occur onsite. The implementation of this plan will provide onsite mitigation greater than 1:1 to offset the loss of coastal sage scrub. 61. Surface soils and seed source will be gathered from areas of the project site and spread within onsite mitigation areas.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
<u>Slender Mariposa Lily</u> 62. A conceptual mitigation plan for transplanting relocated lilies shall be developed by consulting biologists. That plan shall describe transplantation techniques, monitoring, and provide data required by Responsible Agencies during a 5-year monitoring period.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
<u>San Diego Horned Lizard</u> 63. Impacts on the San Diego horned lizard can be mitigated to a level of less than significant by restoring coastal sage scrub habitat. This will create a temporal loss of the species, but the population should recover following restoration of this habitat. Topsoils should be selected that are friable to suit lizard habitat requirements.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
<u>California Gnatcatcher</u> 64. Surveys shall be conducted for California gnatcatchers prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in accordance with USFWS protocol, and if present, a Section 10(a) permit from USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., March through July), a federally permitted biologist will survey areas of project development to determine if the species is present. If California gnatcatchers are present, onsite grading activities shall cease until USFWS officials are notified. Either additional coastal sage scrub restoration or the purchase of suitable offsite habitat will be required, if California gnatcatchers are found onsite.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
<u>Least Bell's Vireo</u> 65. Surveys shall be conducted for least Bell's vireo prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in all areas of potential habitat. If this species is present onsite, a Section 10(a) permit from USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., April through July), a biologist will survey areas of project development to determine if the species is present. If present, onsite grading activities shall cease until USFWS officials are notified.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
<u>Western Burrowing Owl</u> 66. Preconstruction surveys shall be conducted by a consulting biologist at least 30 days prior to project grading to determine if the species is within the project site. If surveys indicate the presence of western burrowing owls, a relocation program shall be implemented.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
<u>Migratory Bird Treaty Act</u> 67. To prevent the loss of an active migratory bird nest, vegetation shall not be cleared during the breeding season (i.e., March 15 to August 1). If vegetation clearing needs to occur, surveys shall be conducted by biologists to determine active migratory bird nests. All active migratory bird nests shall be protected until the young become independent.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
<u>Raptor Nests</u> 68. If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest, until the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the non-breeding season.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
4.4.2 Wetlands and Riparian Habitat Offsite Mitigation Sites 69. Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies for consideration to compensate for impacts on riparian and wetland resources as a result of project development. These sites include Bull Creek, Bee Canyon and East Canyon, which are located proximate to the project site. Prior to the development of any detailed mitigation plans and drawings, the final selection will be determined cooperatively by the CDFG, Corps, SWRCB, and other regulatory agencies in conjunction with the City and project proponent.	Project Proponent	Throughout landfill operations.	Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
<u>Purchasing Wetland Credit</u> 70. If a potential candidate site is unavailable, the project proponent would purchase wetland credit through an established mitigation bank. The project proponent would be required to pay an amount established by the mitigation bank developer (i.e., public, non-profit, or private entity) as compensatory mitigation.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
<u>Funding of an Invasive Species Eradication Program</u> 71. Under the direction of the Corps, the project proponent would seek authorization under Regional General Permit No. 41, which would allow the mechanized removal of invasive, exotic plants (e.g., giant reeds [<i>Arundo donax</i>] and salt cedar [<i>Tamarix</i> spp.]) from waters of the U.S., including wetlands within the jurisdiction of the Los Angeles District of the Corps.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.4.3 Native and Nonnative Tree Resources			
72. Native tree species shall be replaced at a 2:1 (replacement:removal) ratio, consisting of 15-gallon or 5:1 3-gallon container trees. Mitigation trees shall be planted prior to impacted trees being removed, thus allowing trees to grow to specimen size in the field. A specimen-size tree shall be defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above ground. All mitigation trees shall be specimen size within 1 year after tree removal.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
73. Nonnative tree species shall be replaced at a 2:1 ratio, consisting of 3-gallon Coast live oak trees. A total of 100 24-inch box and 25 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio, shall be reduced by 125 trees to account for the inclusion of these larger trees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
74. Mitigation tree planting shall occur within the 100± acre open space buffer area located south of the existing inactive landfill. Appropriate planting locations shall be selected within the buffer area based on soil type, steepness of the slope, and aspect (i.e., location and or direction of the sun).	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
75. Prior to tree planting, the mitigation site shall be prepped to create an environment favorable for native and nonnative tree growth and survival. The initial step in tree planting is to clear away unwanted grass, weeds, or brush. A minimum 3-foot radius of vegetation shall be cleared around the planting location. All planting holes shall be dug to a minimum depth of 24 inches. If soil conditions cannot accommodate the minimum depth, planting holes shall be relocated to a more suitable location. Trees will be spaced 15 to 20 feet in a random, nongeometric pattern. Row or grid spacing will be avoided to provide a natural look to the mitigation planting.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
76. A poultry wire screen with 1-inch-diameter holes shall be installed around the outside wall of the tree planting hole and folded closed on the bottom. The screen shall extend downward to enclose the root ball of the tree that will protrude 1 foot above final grade.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
77. Backfill material shall be used for planting material and shall consist of loose friable soil. The planting shall be backfilled to a depth that allows the root crown of the plant to be even with or slightly higher than the surrounding grade. All planting locations shall be preirrigated to ensure that moisture levels are at or near capacity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
78. Prior to tree planting, all containers shall be thoroughly soaked. Once at the mitigation site, trees shall not be removed from their containers until all site preparation work has been completed. The wire cage shall be installed around the planting hole, and backfill material shall be filled to one-half the depth of the root wad. A 27-gram Agriform fertilizer tablet shall be placed approximately 1 inch from the root wad. Backfilled soil shall be tamped and soaked to remove any air pockets.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
79. Following tree planting, the area shall be mulched with either wood chip or recycled green waste. The mulch shall be applied in an even layer approximately 6 inches or more in thickness.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
80. Drip irrigation shall be provided for all planted trees to ensure adequate growth and	Project	Throughout landfill operations.	Monitoring Agency: City Planning Dept.

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
allow year-round planting. The irrigation system shall include a liquid fertilizer injection system to maintain optimum plant health and growth.	Proponent		Enforcement Agency: City Planning Dept.
81. The irrigation system shall utilize plastic polyvinyl chloride piping as its main supply lines. Distribution lines shall consist of 1/2-inch-diameter polyethylene drip tubing. Water shall be delivered to the plants via conventional drip spot emitters. Vortex emitters rated at 1 to 3 gallons per hour shall be used for the emitters. All irrigation water shall be filtered through a "Y" filter containing a 150 mesh screen. The irrigation systems shall be controlled automatically with remote battery-powered controllers and electrical irrigation valves. Watering frequency and duration shall be adjusted as necessary, depending on soil condition, weather, and plant requirements. To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program shall be implemented. Each year the mitigation planting shall be monitored for growth and survival.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
82. An annual monitoring report shall be prepared and submitted to the City Department of Public Works, Street Tree Division by the project proponent. This report shall detail the growth and survival record for each mitigation tree planted. The report will provide an accounting of the number of trees required for mitigation versus the number of qualifying trees planted. Maintenance recommendations will be included in the annual report.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
4.5 NOISE			
4.5.1 Construction Noise Impacts			
Sensitive land uses would not be impacted by project construction; therefore, no mitigation measures would be required.			
4.5.2 Operational Noise Impacts			
83. Landfilling operations shall be limited to the hours of 6:00 a.m. to 6:00 p.m., Monday through Friday, and from 7:00 a.m. to 2:00 p.m. on Saturday. However, the landfill entrance gate shall be open to waste-hauling vehicles at 5:00 a.m., Monday through Friday, and at 7:00 a.m. on Saturday to provide for truck and vehicle queuing. Because of the proximity of the landfill site to residential areas, citizens, small commercial, and private users of the landfill shall be encouraged by the project proponent (e.g., onsite signage, flyers, mailers) to use alternate routes (other than Balboa Boulevard).	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept., and City LEA Enforcement Agency: City Planning Dept., and City LEA.
84. All landfill equipment shall be equipped with air flow silencers on intake systems and low-noise mufflers on exhaust systems that shall be properly maintained.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept., and City LEA Enforcement Agency: City Planning Dept.
4.6 LIGHT AND GLARE			
85. All lighting shall be shielded and directed onto the site. No floodlighting shall be located that can be seen directly by adjacent residents, motorists on adjacent public streets or highways, or pilots within the "airport approach zone." This condition shall not preclude the installation of low-level security lighting.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.7 LAND USE			
4.7.1 Community Plan and Zoning Designations			
86. Maintain and enhance the 100± acre open space buffer area in the southern portion of the site by implementing revegetation programs in conjunction with onsite programs	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
4.7.2 General Plan Elements			
No mitigation measures would be required.			
4.7.3 Regional, State and Federal Plans			
No mitigation measures would be required.			
4.7.4 Other Landfill and Transfer Station Facilities			
No mitigation measures would be required.			
4.8 NATURAL RESOURCES			
Refer to Section 4.9.6, Risk of Explosion for a discussion of potential re-abandonment mitigation measures.			
4.9 RISK OF UPSET			
4.9.1 Hazardous Materials			
87. The landfill shall be operated as a Class III landfill; no liquid, acutely hazardous, radioactive material, or infectious medical wastes will be accepted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LARWQCB, and City LEA Enforcement Agency: CIWMB, and City LEA
88. Haulers disposing of drums (i.e., 55-gallon) shall have drums triple-rinsed with tops and bottoms removed prior to acceptance.	Project Proponent	Throughout landfill operations.	Monitoring Agency: DTSC, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
89. Notices shall be posted at prominent locations onsite to notify waste haulers about hazardous waste policies of the landfill operator and to inform haulers that hazardous waste cannot be disposed of at the facility. Signage shall help inform waste haulers of the rules and regulations governing the disposal of hazardous waste.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
90. A refuse inspection program that includes direct visual inspection, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles, and radiation detecting devices shall be implemented by the landfill operator to prohibit the illegal dumping or disposal of liquids and hazardous wastes at the landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, CIWMB, and City LEA Enforcement Agency: SCAQMD, CIWMB, and City LEA
91. The landfill operator shall implement a hazardous waste load-checking program. This program shall include inspecting random loads for hazardous wastes in a segregated area of the landfill, and landfill employees shall scan waste materials as they are being unloaded at the active working face. Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
92. If hazardous waste materials are discovered, emergency response shall include worker identification and notification procedures, cordoning off the area, and notifying Cal-EPA, DTSC. . Once hazardous waste is identified, the material shall be removed, containerized, and temporarily stored onsite, if safe to handle. In the unlikely event that acutely hazardous material is discovered, the immediate area will be evacuated, and a qualified hazardous waste hauler shall be contacted for immediate collection and disposal of the material at a permitted Class I hazardous waste landfill. After any such incident, all necessary reports shall be completed and filed by the landfill operator with the following agencies: City of Los Angeles Police Department, County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, City of Los Angeles Fire Department, City of Los Angeles Department of Environmental Affairs, and the LARWQCB.	Project Proponent	Throughout landfill operations.	Monitoring Agency: DTSC, CIWMB, LAPD, and City LEA Enforcement Agency: CIWMB and City LEA
93. Landfill employee training programs on hazardous waste detection shall be conducted. These programs shall be presented during preemployment and for subsequent annual review for all employees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: DTSC, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
94. The spill response program shall be part of required training for all facility employees. In the event of a spill, containment is paramount. All landfill employees shall be trained to use dirt and/or other absorbent materials to pick up and/or contain small spills of oils, solvents, and/or other materials that may be harmful to the public, facility workers, or the environment. Training in the use of personal protective equipment, fire extinguishing aids (e.g., hoses or extinguishers), and spill containment/mitigation (e.g., absorbents) shall be provided.	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
95. Full-time inspectors shall be employed onsite for inspection of waste materials. Full-time inspectors shall be deemed by the City to be qualified through training and experience to perform assigned duties.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.2 Vectors			
96. The landfill operator shall monitor the site on a regular basis for vector activity. In addition, the site shall be inspected by the City LEA on a regular schedule. Corrective measures shall be immediately taken should a vector problem be detected.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
97. Vectors (bird activity) shall be effectively eliminated by stringing wire or monofilament line (15 to 20 pound test) above the active landfill working areas at intervals of 100 to 150 feet, or by other approved means. This disrupts the birds' circling patterns to the extent that they do not attempt to land or congregate to feed on the refuse.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
98. Flies shall be controlled at the project site by a trap-and-destroy program. The use of sprays shall be avoided to the fullest extent possible.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
99. Rodent-related problems shall be controlled by operational techniques that are in accordance with recommendations from the City LEA and the Cal-EPA.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
100. Operational techniques shall be utilized to limit vector activity, including compacting waste at the landfill active working face, properly applying cover material; keeping the active working face as small as safely possible given the type and number of landfill equipment, properly grading interim fill surfaces and final fill slopes, and eliminating	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
ponding areas at the project site.			
101. All equipment shall be in good condition and cleaned in a frequency and manner so as to prevent the propagation or attraction of flies, rodents, or other vectors, and the creation of nuisances.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
102. Items used at the landfill facility that could attract vectors (e.g., food, seed, office supplies, etc.) shall be stored in closed containers and/or within an enclosed structure. These containers shall be inspected regularly and shall be disposed of if they appear to be an attraction to any vectors.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
103. Salvaged materials generated onsite or imported shall be placed away from storage areas, other activity areas, and limited to a volume approved by the City LEA, local land use authority, or other approval agencies, minimizing the harborage or attraction of flies, rodents, or other vectors, and the creation of nuisances.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
104. All buildings, paved areas, landscaped areas, and perimeter areas shall be inspected regularly for signs of vectors. Any building openings, ground holes, and deficiencies shall be repaired as they are discovered during routine inspections to prevent the intrusion of any ground vectors.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
105. In the event that vectors may occur onsite, appropriate measures shall be implemented (e.g., the use of a professional exterminator).	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.3 Litter			
106. The landfill site shall be operated to minimize litter generation through implementation of the following measures: compaction of waste at the working face (i.e., 1,400 pounds of compaction per cubic yard); waste materials covered with at least 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day; and maintenance of the active working face areas as small as safely possible given the type and quantity of landfill equipment.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
107. Litter and debris shall be contained within the landfill property boundaries by the use of secondary litter fences (located along the outside perimeter of the landfill) and by portable litter fences placed adjacent to the active working face areas.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
108. The landfill operator shall inform owners of registered vehicles, by signage, to comply with vehicle tarping requirements under § 23114 and 23115 of the California Vehicle Code. Those waste haulers who repeatedly violate this code shall not be allowed to dispose of their waste loads at the facility or shall be fined until corrective measures are taken.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
109. On-a-once a week basis, or as needed, the landfill operator shall mobilize cleanup crews to provide litter pickup services within the O'Melveny Park area, along Balboa Boulevard and San Fernando Road, and in other residential areas located in proximity to the landfill, that may be affected by offsite litter migration. On a daily basis, the cleanup crews shall inspect the surrounding area to assess if more frequent cleanups are required.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept., and City LEA Enforcement Agency: City Planning Dept. and City LEA
110. Landfill employees shall watch for any illegal dumping activities on or around the project site. The landfill litter control crew shall provide cleanup service for areas	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
surrounding the project site.			
111. The administrative offices shall be equipped with a radio dispatch system that can quickly engage crews to respond to perceived litter complaints in the surrounding neighborhoods.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB
112. The onsite City LEA shall inspect the landfill on a regular basis, at which time the effectiveness of the litter control program shall be documented and any necessary improvements shall be made, including: a. Landfill personnel shall continuously patrol the access road to the scales from the time the landfill opens until the time of closure in the evening. b. Improperly covered or contained loads that may result in a significant release of litter shall be immediately detained and the condition corrected, if practical, before the load proceeds to the active working face areas. If correction cannot be made, the load shall be conducted under escort to the working face. c. All debris found on or along the landfill entrance and working face access roads shall be immediately removed. d. Operating areas shall be located in wind-shielded portions of the landfill during windy periods. e. Litter fences shall be installed in operating active working face areas, as deemed necessary by the LEA.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.4 Employee Safety and Site Security			
113. The landfill operator shall implement an IIP program in compliance with CCR, Title 8, § 3203, designed to protect employees from work-related hazards associated with operation of the landfill site. Unsafe or unhealthful work conditions, practices, or procedures shall be immediately corrected by the landfill operator.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
114. Each supervisor or manager shall conduct regular periodic inspections to identify less-than-adequate or unsafe working conditions, improper or unsafe work practices, or procedures in their work areas. The maintenance supervisor shall be notified of needed repairs or corrective measures using a "safety inspection report" form. Additional inspections shall be accomplished whenever new processes, procedures, substances, or equipment are introduced into the workplace or when a supervisor becomes aware of a new, potential, or previously unrecognized hazard.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
115. Appropriate inspection checklists shall be developed, used, and maintained to accurately reflect various exposures in different work areas. Daily observation of the workplace environment by employees, supervisors, managers, and the safety director shall occur. Discrepancies shall be reported. Records of inspections, deficiencies, and corrective measures shall be maintained in the safety/maintenance offices.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
116. If a problem or discrepancy is identified, an inspection report shall be prepared. The report shall identify the priority assigned to each discrepancy, as follows: Priority One, resolve the problem immediately; Priority Two, resolve the problem by the end of the working day; Priority Three, resolve the problem within 48 to 72 hours; and Priority Four, resolve the problem within 1 week as soon as the part(s) and/or materials are available. Unsafe work practices shall be interrupted immediately by the observing supervisor. Appropriate training shall be implemented. If the unsafe practice	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
continues, progressive discipline shall be employed.			
117. Communication of safety and health methods to employees shall include verbal communication with employees at quarterly safety meetings; small group meetings conducted by first-line supervisors with their respective employee groups that shall be weekly "tailgate," "toolbox," or operations and safety meetings; written safety and health issues posted on employee bulletin boards; safety posters; suggestion boxes for employees to anonymously utilize; and action by management to evaluate and implement the pertinent employee safety suggestions.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
118. Accident/injury reports, inspections, and findings, including corrections and training records, shall be kept for 3 years. The OSHA Log 200 shall be retained by the landfill operator for a period of 5 years. Medical records for those employees involved in handling of hazardous wastes shall be maintained for a period of 30 years after employment termination.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
119. First-aid kits shall be located in dispatch, maintenance, scale houses, and corporate administrative offices, in addition to all supervisor vehicles. These kits shall contain "Band-Aids," bandages, sprays, miscellaneous ointments, and minor treatment supplies. These supplies are intended for treatment of small or nonserious cuts, burns, scrapes, etc. Injuries requiring medical attention shall be treated at the Holy Cross Medical Center. This hospital shall also provide ambulance service.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
120. The landfill operator shall implement an emergency action plan in compliance with CCR, Title 8, § 3220. This plan shall designate emergency escape routes and procedures, rescue and medical duties, methods for reporting fires and other emergencies; and names of persons and departments to contact during an emergency.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, LAFD and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and LAFD
121. The landfill operator shall implement a fire prevention plan in compliance with CCR, Title 8, § 3221. Components of this written fire prevention plan shall include potential fire hazards and their proper handling and storage procedures; potential ignition sources (i.e., welding or smoking), their control procedures, and the type of fire protection equipment or systems that can control a fire involving them; names or regular job titles of those responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires; and names or regular job titles of those responsible for the control of accumulation of flammable or combustible waste materials.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, LAFD and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and LAFD
122. In compliance with CCR, Title 8, § 3314, lockout/blockout procedures shall be implemented at the proposed project. Machinery or equipment capable of movement shall be stopped and the power source deenergized or disengaged: if necessary, the moveable parts shall be mechanically blocked or locked out to prevent inadvertent movement during cleaning, servicing, or adjusting operations. If the machinery or equipment must be capable of movement during this period in order to perform the specific task, the designated station manager or supervisor shall minimize the hazard of movement by providing and requiring the use of extension tools or other methods to protect employees from injury. Prime movers, equipment, or power-driven machines equipped with lockable controls or readily adaptable to lockable controls shall be locked out or positively sealed in the "off" position during repair work and setting-up	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
operations. The operator shall provide a sufficient number of accident prevention signs or tags and padlocks, seals or other similarly effective means to safely conduct repairs.			
123. Personal protective equipment shall be provided to all operations employees and will include hard hats, heavy gloves, ear plugs, dust masks, safety boots, goggles, and safety vests.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB and Cal/OSHA, and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and City LEA
124. The landfill operator shall comply with all applicable safety ordinances contained in the City of Los Angeles Municipal Code.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S, LAPD, and City LEA Enforcement Agency: City B&S, LAPD, and City LEA
125 The landfill operator shall maintain perimeter fencing in and around the site in accordance with CCR, Title 14, § 17658 to discourage illegal entry to the landfill. Where existing topography conditions create an effective barrier, no perimeter fencing shall be installed. Entrance and access gates shall remain locked when the landfill facility is not in operation. All existing perimeter fencing shall be inspected on a routine basis by the landfill operator, and necessary repairs shall be made to ensure a continued deterrent for unauthorized entry to the project site. Additionally, the landfill operator shall maintain posted "no trespassing" signage at the exterior perimeter fencing nearest the project site entrance.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S, LAPD, and City LEA Enforcement Agency: City B&S, LAPD, and City LEA
126. All landfill equipment shall be properly maintained and operated to minimize the health and safety impacts on landfill personnel and the public. Standby equipment shall be made available during periods of vehicle maintenance or breakdown.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, CIWMB, and City LEA Enforcement Agency: SCAQMD, CIWMB, and City LEA
4.9.5 Human Health			
127. A citizen's advisory committee shall be established, if deemed necessary by the City Council or Planning Commission through a project condition, to address area resident health concerns about the existing inactive and proposed City/County Landfill Project. The committee's mandate shall include discussions with appropriate technical experts and regulatory agencies responsible for the on- and offsite monitoring activities at the project site. The advisory committee would be responsible for presenting information and discussions of these regulatory agency members back to area residents through planned informational meetings.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
4.9.6 Risk of Explosion			
<u>Landfill Gas and Collection System</u>			
128. Onsite structures shall be continuously monitored for the presence of unsafe levels of methane gas.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, SCAQMD, LAFD, and City LEA Enforcement Agency: CIWMB, SCAQMD, LAFD, and City LEA
129. If necessary, the landfill operator shall install electrical (e.g., battery backup) combustible gas detectors in habitable structures. Employees shall be trained in all applicable safety requirements to prevent any upset conditions from occurring.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, SCAQMD, and City LEA Enforcement Agency: CIWMB, SCAQMD, and City LEA
130. Risks associated with the gas collection and flaring system shall be mitigated through	Project	Throughout landfill operations.	Monitoring Agency: CIWMB, SCAQMD, and City

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
use of flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety shutdown devices have been designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, shall be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground shaking from an earthquake, and necessary action shall be taken to correct any potential problems.	Proponent		Enforcement Agency: LEA CIWMB, SCAQMD, and City LEA
<u>Abandoned Well Sites</u>			
131. Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded, subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
132. A portable explosive gas detection device shall be utilized to determine whether the obstruction is a wellhead that may be leaking natural gas. If this is the case, all personnel shall be evacuated within a 500-foot radius and a representative from the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources shall be notified. Excavation activities shall cease until further instruction from Division of Oil, Gas, and Geothermal Resources is received. If gas is not detected, a backhoe or similar type of equipment shall be brought in to further expose the obstruction. If necessary, proper abandonment procedures will be utilized following Division of Oil, Gas, and Geothermal Resources protocol.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Cal. Dept. of Conservation, Division of Oil, Gas, and Geothermal Resources Enforcement Agency: SCAQMD, and City LEA SCAQMD and City LEA
<u>Trenches and Excavations</u>			
133. A portable explosive gas detection device shall be utilized in trenches and excavations to determine the presence of methane gases. If unsafe concentrations of gas exist, all employees would be immediately removed from the area of unsafe gas concentration. The safety monitor would be responsible for ensuring that appropriate worker safety equipment is operable, as well as worker education and instruction correctly implemented, to prevent the potential for methane gas explosions.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Cal. Dept. of Oil and Gas, SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.9.7 Airport Safety (Bird Strikes)			
134. In accordance with CCR § 17258.10 and 40 CFR Section 258.10, the project proponent will notify Whiteman Air Park and the FAA of the proposed project and projected startup date.	Project Proponent	Before project construction.	Monitoring Agency: City LEA Enforcement Agency: City LEA
4.9.8 Electromagnetic Fields			
No mitigation measures would be required.			
4.10 POPULATION			
No mitigation measures would be required.			
4.11 HOUSING			
No mitigation measures would be required.			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.12 RIGHT-OF-WAY AND ACCESS No mitigation measures would be required.			
4.13 TRANSPORTATION AND CIRCULATION 4.13.1 Traffic 135. For those intersections where project-related traffic volumes are expected to create poor operating conditions and/or significantly impact the operating conditions of the study area intersections, mitigation is designed to improve and/or change the existing intersection geometry, thereby, increasing existing intersection capacity. Capacity improvements shall include roadway widening, roadway restriping, reconfiguring roadways, or providing additional lanes to various approaches of a key intersection. 136. <u>Roxford Street at the I-5 Freeway, (SB ramp)</u> Restripe westbound approach on Roxford Street to provide dual left-turn lanes and one through lane. 137. <u>Roxford Street at the Encinitas/I-5 Freeway (NB ramp)</u> Restripe northbound approach on Encinitas Avenue to provide left-turn lane, shared through/left-turn lane, and shared through/right-turn lane. 138. <u>San Fernando Road at Balboa Boulevard</u> This key intersection features two through lanes in each direction on San Fernando Road and two northbound approach lanes, striped as an exclusive left-turn lane and an option left-right turn lane, are provided on Balboa Connector. A separate westbound left-turn lane as well as protected left-turn phasing is provided. Existing pavement widths and physical constraints (i.e., hillside encroachment) do not allow for any physical improvements, such as providing an exclusive eastbound right-turn lane on San Fernando Road for heavy existing and anticipated right-turn volumes. 139. Contribute to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC shall be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. 140. <u>San Fernando Road at Sierra Highway</u> Restripe northbound approach on San Fernando Road to provide a shared through/right turn lane and exclusive right-turn lane and restripe the westbound approach of Sierra Highway for a 12-foot-wide curb lane. 141. <u>San Fernando Road at Project Driveway</u> Install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LADOT Enforcement Agency: LADOT

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
<p>contribution to ATSAC shall be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.</p> <p>142. The required street improvements and signal modifications shall be guaranteed before the issuance of any building permit for this project through the B-permit process of the Bureau of Engineering, Department of Public Works, and the encroachment permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of LADOT, the Bureau of Engineering, and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a pre-design meeting to finalize the proposed geometric and traffic signal designs for the project.</p>			
<p>4.13.2 Los Angeles County Congestion Management Program</p> <p>No mitigation measures would be required.</p>			
<p>4.13.3 Construction-Related Traffic</p> <p>No mitigation measures would be required.</p>			
<p>4.13.4 Parking and Safety Concerns</p> <p>143. Prior to issuance of any certificate of occupancy for the project, install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is \$79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.</p>	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LADOT Enforcement Agency: LADOT
<p>4.13.5 Access Road in Sunshine Canyon</p> <p>No mitigation measures would be required.</p>			
<p>4.13.6 Public Transportation</p> <p>No mitigation measures would be required.</p>			
<p>Rail and Light Rail</p> <p>No mitigation measures would be required.</p>			
<p>Bicycle Routes</p> <p>144. The following mitigation measure is proposed by the project proponent to address any potential localized impact along the San Fernando Road bicycle lane from increased truck traffic at or near the project site: Signs acceptable to the City shall be posted at or near the entrance to the landfill facility. These signs shall caution the public that heavy truck traffic exists in the area.</p>	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LADOT Enforcement Agency: LADOT

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.14 PUBLIC SERVICES			
4.14.1 Fire and Emergency Medical Services			
145. Onsite water trucks shall provide sufficient water storage and pumping capabilities to extinguish fires. Tracked dozers and scrapers shall be utilized to smother any onsite fires. Easily accessible soil stockpile areas for daily cover shall be used by landfill personnel to smother onsite fires.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
146. Definitive plans and specifications shall be submitted to the LAFD and requirements for necessary permits satisfied prior to commencement of landfill development.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
147. The project proponent shall maintain and expand existing onsite fire response capabilities by using heavy operating equipment and readily available fire-extinguishing equipment. A 200-foot long, 1½-inch-diameter fire hose shall be available on water trucks for firefighting at the landfill working face area. If necessary, earth moving equipment shall be used to control fires by smothering fires with dirt.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
148. Hydrants shall be installed in conformance with LAFD requirements and Los Angeles City Fire Code § 57.09.06.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
149. New construction and placement of water tanks, water mains, and fire hydrants shall be completed prior to landfilling operations and shall meet final fire flow requirements determined by the LAFD.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
150. The project proponent shall maintain brush clearance within 100 feet of landfill operations and structures as specified in the Los Angeles City Fire Code § 57.21.07 and 57.25.01. Fire-resistant native plants shall be maintained free of combustible litter (i.e., partly decayed/organic matter). These plants shall be used without restriction within this brush clearance zone.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
151. Fire breaks, roads, and fire trails shall be maintained by the project proponent in accordance with the Los Angeles City Fire Code § 57.09.04 and 57.25.03.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
152. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, LAFD, City BOE, and City B&S
153. Any person owning or having control of any facility, structure, or group of structures on the premises shall provide and maintain LAFD access.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, LAFD, City BOE, and City B&S
154. Access for LAFD apparatus and personnel to and into all structures shall be required.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: LAFD, City BOE, and City B&S
155. Construction of the realigned access roadway shall not exceed 15 percent in grade. An access road shall be constructed and maintained around the working area of the landfill for emergency access for fire fighting equipment.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, City BOE, City B&S

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
156. The project proponent shall temporarily close the landfill if a fire of regional significance is located near the project area and poses an imminent threat to the safety of landfill employees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
157. A detailed fire response plan shall be prepared by the project proponent that incorporates LAFD requirements.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
158. Fire extinguishers shall be maintained in all heavy equipment, onsite work vehicles, and all structures as required by the Los Angeles LAFD.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
159. Signs shall be posted onsite and in a manner approved by the City Fire Chief prohibiting open burning within the project area, as specified under City of Los Angeles Fire Code, § 57.25.02.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
160. All internal combustion engines used in landfilling operations shall be equipped with spark arresters.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
161. Landfill equipment shall be cleaned regularly to reduce the potential for equipment fires.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
162. Vehicle and mechanical inspections shall be performed on a regular basis, and focus on the electrical system, hydraulic, and fuel lines.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
163. The project proponent shall provide fire control in compliance with CCR, Title 14, Division 7, Chapter 3, Article 7.6, § 17741 (Burning Wastes). If burning waste is received at the landfill site it shall be deposited in a safe, isolated area of the landfill and extinguished. If burning waste has been deposited at the working face area, it shall immediately be excavated, spread, and extinguished.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
164. In the event the project proponent detects settlement or venting of smoke, the City LEA shall be contacted. The project proponent under the direction of the City LEA shall undertake appropriate measures to identify the location of the subsurface fire and implement the appropriate fire control techniques to assure the fire has been extinguished.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
4.14.2 Police No mitigation measures would be required.			
4.14.3 Schools 165. Prior to the issuance of an occupancy permit, the project proponent shall submit proof to the City's Department of Building and Safety that all applicable school impact fees have been paid.	Project Proponent	Prior to landfill development.	Monitoring Agency: LAUSD Enforcement Agency: LAUSD
4.14.4 Parks and Recreational Resources No significant impact on park and recreational resources are anticipated, and no mitigation measures are required. Refer to the following mitigation measures included within this Draft SEIR: Section 4.2.11, Air Quality-Construction; Section 4.2.12, Air Quality-Operations; Section 4.9.3, Litter; and Section 4.18, Aesthetics/Views.			
4.14.5 Hiking and Equestrian Trails			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
No significant environmental impact on hiking and equestrian trails is anticipated; therefore, no mitigation measures are required. Refer to the following mitigation measures included within this Draft SEIR: Section 4.2.11, Air Quality-Construction; Section 4.2.12, Air Quality-Operations; Section 4.9.3, Litter; and Section 4.18, Aesthetics/Views.			
4.14.6 Libraries The topical issue of libraries was determined not to be significant in the Initial Study and Checklist dated July 25, 1991.			
4.15 ENERGY CONSERVATION There will not be any significant impacts on energy resources as a result of project development; therefore, no mitigation measures are required. Specific energy conservation mitigation measures for the proposed implementation and development of onsite buildings and ancillary facilities are provided in Section 4.16.1, Electricity.			
4.16 UTILITIES 4.16.1 Electricity			
166. The project proponent shall incorporate measures that will exceed minimum efficiency standards for Title 24 of the CCR.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
167. Built-in appliances, refrigerators, and air conditioning equipment shall exceed the minimum efficiency standards for Title 24 of the CCR.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
168. Buildings shall be well sealed to prevent outside air from infiltrating and increasing interior air conditioning and space heating loads. A performance check of the installed air conditioning and space heating systems shall be completed by the project proponent prior to the issuance of the certificate of occupancy to ensure the system properly operates.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
169. Thermal insulation that exceeds requirements established by the CCR shall be installed in walls and ceilings.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
170. Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
171. Heat-reflective draperies shall be installed on appropriate exposures.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
172. Fluorescent and high-intensity-discharge lamps, which give the highest light output per watt of electricity consumed, shall be installed wherever possible, including all parking lot and site lighting to reduce electricity consumption.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
173. Occupant-controlled light switches and thermostats shall be installed to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: City B&S, and DWP Enforcement Agency: City B&S and DWP
174. Time-controlled interior and exterior public area lighting limited to that necessary for	Project	Before project occupancy of the	Monitoring Agency: City B&S, and DWP

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
safety and security shall be installed.	Proponent	buildings.	Enforcement Agency: City B&S and DWP
4.16.2 Natural Gas No mitigation measures would be required.			
4.16.3 Communication Systems No mitigation measures would be required.			
4.16.4 Water 175. The project proponent shall coordinate with DWP in advance to efficiently obtain potable water for delivery to the construction site and to meet any restrictions imposed.	Project Proponent	Throughout landfill operations.	Monitoring Agency: DWP Enforcement Agency: DWP
176. When reclaimed water lines are extended into the project area, and if economically feasible, reclaimed water would be utilized onsite for irrigation and dust suppression. Prior to the submittal of design plans to the City's Building and Safety Department, the project proponent shall investigate the possibility of utilizing reclaimed water at the project site.	Project Proponent	Throughout landfill operations.	Monitoring Agency: DWP Enforcement Agency: DWP
177. During the site life of the landfill and ancillary facilities, the landfill operator shall effectively utilize water conservation measures at the project site. These measures shall include the following: a. The project proponent shall install an efficient drip irrigation system that minimizes runoff and evaporation, and provides water distribution in an efficient manner. b. A dust suppression additive shall be utilized onsite to minimize water usage. c. Green waste/wood waste (after grinding) will be used onsite as mulch material for revegetation purposes. Mulch shall be applied on the top layers of revegetation areas to improve the water-holding capacity of the soil. d. Onsite revegetation shall include the use of water-conserving plant materials to the greatest extent possible.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City LEA, and DWP Enforcement Agency: DWP
4.16.5 Sewers No mitigation measures would be required.			
4.16.6 Stormwater Drainage No mitigation measures would be required.			
4.16.7 Solid Waste No mitigation measures would be required.			
4.17 SAFETY Refer to Section 4.9.4, Employee Safety and Site Security, within this table.			
4.18 AESTHETICS/VIEWS 178. The maximum permitted elevations for the landfill shall not be allowed to be exceeded at any time during landfill development and shall be verified through survey control points.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
179. The cover-material excavation areas shall be confined as much as possible to areas that will later be landfilled.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
180. As part of revegetation efforts for the landfill, the upper ridges of the canyon shall be planted with native species (both trees and scrubs) to supplement existing vegetation on the ridgelines and reestablish naturally bare areas.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
181. The final cover of landfilled areas shall be landscaped with a ground cover mix and plant species that are compatible with the immediate area and shall be maintained in a natural setting until it is converted to its final use.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
182. The 100± acre open space buffer zone on the southern boundary of the project site shall continue to be maintained and enhanced with both native and nonnative vegetation.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
4.19 CULTURAL/SCIENTIFIC RESOURCES			
4.19.1 Archaeological			
183. Prior to the commencement of initial earth excavation, specific sections of the project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered archaeological resources. Specific areas within the project site to be resurveyed shall be determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists. Factors to be considered for delineation of areas to be resurveyed will be known site selection factors associated with aboriginal groups suspected of having inhabited the general area. These factors include proximity to water, the type of vegetation (e.g., food source, shelter, and fuel), and the topography (e.g., slope and aspect).	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
184. An archaeologist shall be present onsite during major infrastructure work which requires significant surface disturbance.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
185. The landfill operator shall instruct landfill equipment operators how to identify archaeological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of aboriginal habitation is discovered during earthmoving activities, landfill operations will cease in that particular location until a qualified archaeologist has made a determination as to the significance of the site or findings. Any significant archaeological resources shall be recovered to the extent practicable prior to resuming activities in that area of the landfill.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
186. Archaeological resources recovered during surface collection, subsurface excavations, and monitoring, with related records, notes, and technical reports shall be curated at a regional repository approved by the City.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
4.19.2 Paleontological Resources			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
187. Prior to the commencement of initial earth excavation, specific sections of the City/ County Landfill Project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered paleontological resources. Specific sections of the project area to be resurveyed shall be as determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified by the project proponent, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
188. A paleontologist shall be onsite during major infrastructure work that requires significant excavation. In the event that paleontological resources are discovered during grading or excavation, the paleontologist shall be allowed to redirect grading away from the area of exposed fossils to allow sufficient time for inspection, evaluation, and recovery.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
189. The landfill operator shall instruct landfill equipment operators how to identify paleontological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of paleontological resources is discovered during earthmoving activities, landfill operations shall cease in that particular location until a qualified paleontologist has made a determination as to the significance of the findings.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
190. Any significant paleontological resources shall be recovered to the extent practicable. Due to the potential for rapid deterioration of exposed surface fossils, preservation by avoidance is not an appropriate measure. When fossils cannot be removed immediately, the site shall be stabilized to prevent further deterioration prior to data recovery or the fossil location as directed by a professional paleontologist.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
191. The paleontologist shall be retained to perform inspection of the excavation and salvage exposed fossils. Collected fossils shall be curated at a public institution with an educational/research interest in the material. Any curatorial expenses shall be borne by the landfill operator.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
4.19.3 Historical			
No significant impacts on historical resources were identified; therefore, no mitigation measures are proposed.			

**STATEMENT OF OVERRIDING
CONSIDERATIONS
- Exhibit No. E-10**

STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to California Environmental Quality Act ("CEQA") § 21081.6 (Reporting and Monitoring), the recommended conditions of approval incorporate the environmental mitigation measures defined in the Final SEIR. Implementation of the conditions will reduce many of the identified environmental impacts to a level that is deemed to be less than significant. However, certain significant adverse impacts will continue to remain, even with the adoption of these conditions, and are therefore deemed unavoidable.

These unavoidable impacts relate to the operational aspects of the proposed project and/or the cumulative development of related projects in conjunction with the proposed project. The environmental effects identified in the FSEIR that cannot be mitigated below a level of significance are described below:

Air Quality. As defined by the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants. During construction, emissions for No_x (nitrogen oxides) and PM_{10} (particulate matter) would result in an exceedance of the SCAQMD significance thresholds after the incorporation of mitigation measures. Operations would result in exceedances of the CO (carbon monoxide) No_x (nitrogen oxides), SO_x (sulfur oxides) ROG (reactive organic gases), and PM_{10} (particulate matter) criteria and would remain significant after the incorporation of mitigation measures.

The environmentally superior alternative is the "No Project" alternative. Pursuant to State CEQA Guidelines, § 15126, subd. (d)(4). The next environmentally superior alternative was evaluated to be the "Immediate Combined City/County Landfill Operations". However, the unavoidable impacts cannot be alleviated even with this alternative, the "Reduced Volume" alternative, or other modifications that would be economically feasible.

Pursuant to CEQA § 21081 and CEQA Guidelines § 15091 and 15093, the benefits of implementation of the project outweigh the unavoidable environmental effects and therefore the adverse environmental effects are determined to be "acceptable" for the following reasons:

1. Comply with comprehensive, long term plans of the City and County of Los Angeles.

Approval of the recommended action would further the intent, purposes, and objectives of programs and policies in the Granada Hills-Knollwood Community Plan, Citywide General Plan Framework Element, City-Collection Refuse Disposal Plan, basis for the City Solid Waste Management Plan, and County plans related to solid waste management. Compliance of the proposed project with these and other solid waste management plans is discussed in the Draft SEIR, Section 4.7.3, *Solid Waste Management Plans*, pp. 4-273 through 4-279. Refer also to the Final SEIR, Responses 895 and 942. ¹

2. Provide an immediate solution to a potential future crisis in managing the City's solid waste.

Approval of the recommended action would provide an immediate solution to a potential future crisis in managing the City's solid waste disposal. The Final SEIR ², indicates that three landfills have recently closed and four of the seven remaining Class III landfills in Los Angeles County are expected to close or reach capacity within the next 10 years. Based on the 1995 average disposal rate, remaining capacity is projected to be exhausted in less than nine years. References to support these projections are based on the *Los Angeles Countywide Siting Element Volume I: The Element* (Los Angeles County Department of Public Works, Environmental Programs Division, June 1997) and *Preliminary Draft Los Angeles County Countywide Siting Element* (Los Angeles County Department of Public Works, Environmental programs Division, January 1996) and presented in the Draft SEIR, pp. 2-5 through 2-10. Refer also to the Final SEIR, Response 943.

¹ Refer to Findings, Section No.4. Programs and policies referenced in *Solid Waste Management and Disposal Options in Los Angeles County* (Options Report), *Los Angeles County Solid Waste Management Action Plan* (County Action Plan), *City of Los Angeles Solid Waste Management Action Plan* (City Action Plan), *City of Los Angeles Solid Waste Management Plan* (CiSWMP), *City of Los Angeles Solid Waste Management Policy Plan* (CiSWMPP), *City Source Reduction and Recycling Element* (City SRRE), *Integrated Solid Waste Management System for Los Angeles County*, and *Los Angeles County Countywide Integrated Waste Management Plan*.

² Table 2.3-1 (Revised) *Remaining permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in the County of Los Angeles* (See Final SEIR, pp. 2-7 through 2-9). Exhibit No. E-#.

3. Comply with the State of California mandated requirements of AB 939 to provide a minimum 15 years of solid waste disposal capacity.

Approval of the recommended action would enable the City of Los Angeles to fulfil a state mandate. AB 939 requires cities and counties to plan for future solid waste disposal capacity, in addition to implementing source reduction and recycling programs. The Draft SEIR, Appendix C13, Regulatory Overview of State, County and City-enacted Waste Management Acts, provides background information on AB 939 and how the mandates of this statute are implemented by the *Countywide Siting Element (CSE)*, *The County Source Reduction and Recycling Elements (County SRRE)* and the *City Source Reduction and Recycling Element (City SRRE)*.

Furthermore, the City's October 1993 Phase IV report, *Solid Waste Management Policy Plan* contains Objective 3.3, regarding disposal facilities (see page 6-7), calls for the City to:

"...identify, evaluate, and secure by the year 2000 adequate disposal capacity to accommodate projected waste requiring disposal to the year 2020 with an optional reserve capacity in the year 2020 for 20 years of additional disposal."

4. Provide a landfill within proximity to City generated waste streams.

Approval of the recommended action would enable the City and County to meet local solid waste disposal needs for approximately 26 years. Specifically, the "Local Disposal" policy stated in Chapter 6 of the October 1993 Phase IV Report, *Solid Waste Management Policy* recognizes that even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated within the City. Recognizing that the siting of landfills is extremely difficult and lengthy, the policy also provides that the City will look to the expansion of existing landfills, in addition to working with the County to jointly develop landfill capacity. The document specifically mentions the expansion of Sunshine Canyon.

The importance of having a landfill in close proximity to City and County generated waste streams is stated in the *Options*

Report, County Action Plan, CiSWMP, Integrated Solid Waste Management System Draft Program EIR, County SRRE, and CSE. (Refer to the Draft SEIR, Section 4.7.3, Solid Waste Management Plans, pp. 4-273 through 4-281)

Most recently, the importance of having a landfill in proximity to City generated waste streams is stated in a January 26, 1999-memorandum from City of Los Angeles Bureau of Sanitation. As stated in the letter:

"After the Bradley Landfill is closed, and if Sunshine Canyon is not available to the City after the current contract expires, the Bureau will be faced with higher transportation costs to deliver refuse to more distant disposal facilities due to construction of a new transfer station and paying higher transportation costs. A transfer station will have to be constructed in the San Fernando Valley at a capital cost of over \$10 million to serve these areas.

Disposal will be available, but at a greater distance. The Chiquita Canyon landfill will have available capacity, but is 19 miles further from the Central L.A. facility than the Bradley Landfill, thus increasing transportation costs. Other facilities such as El Sobrante Landfill in Riverside, Lancaster Landfill in Antelope Valley, and Bowerman Landfill in south Orange County could have available disposal capacity. But it will cost considerably more because of the average distance from the central Los Angeles area to these more remote located landfills is 60-70 miles (one way)."

5. Provide a landfill facility with local control over that facility.

Approval of the recommended action would provide a landfill within the City jurisdictional boundaries and governed by conditions of approval of the grant. This is in contrast to, by the year 2000, no public or private landfills will be operating within the City (with the possible exception of the Bradley Landfill for 2-3 years); and by 2006, four of the remaining Class III landfills in the Los Angeles region are expected to close or reach capacity. Under these conditions, when the City is faced with a shortfall in solid waste disposal capacity, it must use landfills outside the City and therefore, lose a degree of control over managing its solid waste program.

A condition of approval requires coordination between the City and County in operating these adjoining Sunshine Canyon landfills. The intent of this working agreement, regarding the joint operation of the City and County landfills, is to recognize both the City and County discretionary approvals, common contractual agreements, coordinated environmental mitigation measures and control system, establish mutually agreed upon use arrangements, or other matters that are determined important by the County Board of Supervisors, City Council, and responsible regulatory agencies.³

6. Minimize significant environmental impacts that would occur elsewhere as a result of developing new landfill sites or imposing longer transportation distances to remote facilities.

Approval of the recommended action could eliminate or lessen the potential impact on oak trees and other significant biological resources in the upper reaches of Sunshine Canyon. As stated in the County CUP and Oak Tree Permit (86-312-(5)), City approval of an expansion would avert the destruction of over 1,363 oak trees and significant biological resources in the upper reaches of Sunshine Canyon in the County.

Approval of the recommended action would eliminate or lessen the short-term need to consider alternatives such as potential/proposed landfill sites in Los Angeles and Riverside counties and remote landfill facilities either in State or out-of-State.⁴ The alternative sites evaluated in the Draft SEIR were Elsmere Canyon, Blind Canyon and El Sobrante. The development of Elsmere Canyon was determined to have potentially greater environmental impacts on earth resources, air quality, biological resources, light and glare, land use, transportation, recreation, and aesthetic/views than the proposed project. (See Draft SEIR, Section 5.7.1, p. 5-27.) The development of Blind Canyon would result in potentially greater impacts on earth resources, air quality, surface water, biological resources, parks, water supply, aesthetics, and paleontological resources than the proposed project. (See Draft SEIR, Section 5.7.2, pp. 5-28 and 5-31.) The expansion

³ Refer to the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38 for additional discussion on what the agreement could cover. Also refer to Condition No. A.9.

⁴ A summary matrix in Table 5.3-1 presents a comparative assessment of these alternatives by topical issue.

of El Sobrante would potentially result in greater impacts on earth resources, air quality, surface water, biological resources, light and glare, transportation (due to greater hauling distance to western Riverside County), aesthetics, and archaeological resources than the proposed project. (See Draft SEIR, Section 5.8.1, pp. 5-32 and 5-35.)

Remote landfill facilities analyzed in the Draft SEIR were Eagle Mountain, Railcycle-Bolo Station, Mesquite Regional, and La Paz. The development of Eagle Mountain landfill would result in potentially greater impacts on earth resources, air quality, surface water, water quality, water supply, biological resources, noise, light and glare, natural resources, risk-of-upset, transportation, fire protection, and parks than the proposed project. (See Draft SEIR, Section 5.10.1, pp. 5-42 through 5-54.) The development of Railcycle-Bolo Station Landfill would potentially result in the following impacts that would be greater than the proposed project: earth resources, air quality, water supply, biological resources, light and glare, natural resources, risk-of-upset, transportation, fire and police protection, aesthetics, and paleontological resources. (See Draft SEIR, Section 5.10.2, pp. 5-57 and 5-58.) The development of Mesquite Regional Landfill would result in potentially greater impacts on earth resources, air quality, ground water, biological resources, noise, light and glare, natural resources, risk-of-upset, transportation, aesthetic, and cultural resources than the proposed project. (See Draft SEIR, Section 5.10.3, pp. 5-60, 5-63, and 5-64.) Refer also to the Final SEIR, Responses 124, 893, 905, and 908.

7. Use of land that has been disturbed by previous landfill activities and locate a future landfill use adjacent to a currently operating landfill in Los Angeles County.

Approval of the recommended action will allow an expansion in the City that would occur mostly on land that has been disturbed by previous landfill activities. The Draft SEIR, Section 1.5.2, pp. 1-5 and 1-6, presents a summary of previous landfilling activities that have occurred within the City portion of Sunshine Canyon from 1958 until the expiration of its zoning variance on September 21, 1991. The acreage within the City portion of Sunshine Canyon that has been disturbed from this prior use is summarized in Table 2.4-1 and includes approximately 205 acres from two landfill footprints, 12.5 acres of access road, and 116.50 acres associated with prior landfilling activities including the ancillary facility pads

and nursery areas. Development of the proposed project would encompass ± 80 acres of the existing inactive City landfill.

The proposed project would be adjacent to an existing landfill. Within the County portion of Sunshine Canyon, approximately 215 acres was approved for the landfill footprint. Since August 19, 1996, the County landfill has been in operation. The County CUP also approved the use of an additional 42 acres to connect with the City landfill, if approved. (See Draft SEIR, Table 2.5-1 and p. 2-26.) Currently these areas are disturbed and developed with ancillary facilities such as environmental protection and control systems.

PLAN RESOLUTIONS

- Exhibit No. E-11

RESOLUTION

WHEREAS, the Granada Hills-Knollwood Community Plan was adopted by the City Council on July 10, 1996, and as part of the Community Plan revision the subject property was redesignated to privately owned Open Space from Minimum Residential density with no change to the underlying A1-1-k-0 zone; and

WHEREAS, an application for an amendment to the Granada Hills-Knollwood Community Plan from Open Space to Heavy Industrial and a zone change from A1-1-K-O to M3-1 has been filed on 394 acres to allow the expansion of the Sunshine Canyon Landfill located at 14747 San Fernando Road. The proposed landfill within the City would provide an estimated net airspace disposal capacity of 55 million tons, and a total of 90 million when connected with the currently operating County Landfill by means of the proposed 42-acre extension within the County. The proposed joint operation of the County/City Landfill would allow for a total average waste intake of 11,000 tons per day (tpd) (5,000 tpd in the City in addition to the currently authorized 6,000 tpd in the County), with a daily maximum of 12,100 tons; and

WHEREAS, a Hearing Examiner, as a representative of the City Planning Commission, held a public hearing on the Plan amendment and Zone change on October 27, 1998; and

WHEREAS, a notice of the public hearing was published in several local newspapers, and over 9,000 notices mailed to property owners within a two mile radius of the project, and to other interested parties, and where over 300 participants attended the meeting and presented both oral and written testimony; and

WHEREAS, the General Plan Advisory Board reviewed the project on January 27, 1999, and seven members advised the Director of Planning for approval of the Plan amendment; and

WHEREAS, the City Planning Commission conducted a meeting on February 25, 1999, and evidence, both oral and written, was duly presented to and considered by the Commission, including but not limited to a staff report, exhibits, appendices and public testimony; and

WHEREAS, the proposed Plan amendment would further the programs and policies of the *Citywide General Plan Framework Element*, an element of the General Plan which provides a citywide, comprehensive long-range growth strategy and provides guidance for the preparation of the Infrastructure & Public Facilities and Services Elements of the General Plan, and states that the City's goals would be achieved by providing adequate disposal capacity, ensuring an environmentally sound and cost-effective solid waste management system, creating job opportunities, and preserving the existing perimeter ridges; and

WHEREAS, the proposed plan amendment would achieve several of the Granada Hills-Knollwood Community Plan objectives through designating a facility to provide disposal capacity to meet the needs of the City's population such as "To coordinate the development of Granada Hills-Knollwood with that of other parts of the City and metropolitan area"; "To designate lands at appropriate locations for the various uses and public facilities in the quantities and at densities required to

accommodate population and activities projected to the year 2010"; "To promote economic well-being and public convenience through the allocation and distribution of commercial lands for retail, service, and office facilities in quantities and patterns based on current planning principles and standards"; "Provide for the location and programming of public services and utilities and coordinate the phasing of public facilities with private development"; and "Encourage open space for recreation uses and promote the preservation of views, natural character, and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region; and

WHEREAS, development of the proposed Landfill would conform to the criteria stated in the *City Collected Refuse Disposal Plan*, *City of Los Angeles Solid Waste Management Action Plan*, and the *City of Los Angeles Solid Waste Management Plan (CiSWMP)*, and would implement the solid waste management goals and policies of the City and County of Los Angeles by providing needed solid waste disposal capacity within the County; and

WHEREAS, development of the proposed landfill would comply with the State of California mandated requirements of AB 939 which requires cities and counties to provide a minimum 15 years of solid waste disposal capacity, in addition to implementing source reduction and recycling programs, and that even with an estimated diversion rate of 42 percent, the only alternative for disposing waste that is not recycled is burying it in landfills; and

WHEREAS, development of the proposed landfill would provide an immediate solution to a future crisis in managing the City's solid waste since, three landfills have recently closed and four of the seven remaining Class III landfills in Los Angeles County are expected to close or reach capacity within the next 10 years, and based on the 1995 average disposal rate, remaining capacity is projected to be exhausted in less than nine years; and

WHEREAS, development of the proposed landfill would provide a cost-effective disposal option for the City by providing a landfill within proximity to City generated waste streams, and that according to the Bureau of Sanitation, if the County portion of Sunshine Canyon landfill is not available to the City after the current contract expires, the City will be faced with higher costs to deliver refuse to more distant disposal facilities due to construction of a new transfer station and higher transportation costs; and

WHEREAS, development of the proposed landfill would minimize significant environmental impacts associated with the development of new landfill sites located within undisturbed canyon areas or remote desert locations by using areas of the existing inactive landfill and other areas within Sunshine Canyon that are primarily disturbed due to extensive landfilling operations that have taken place over a 30-year period, and that have infrastructure in place to readily accommodate future development, and minimize impacts on air quality within the region by providing disposal capacity within Los Angeles County, thereby reducing emissions from transporting refuse longer distances; and

WHEREAS, the Final Subsequent Environmental Impact Report (FSEIR), State Clearinghouse No. 92041053 and the Draft Subsequent Environmental Impact Report (Draft SEIR) are part of the

environmental review process undertaken by the City of Los Angeles, and that the public review period closed on December 5, 1997. The Notice of Completion and Availability (NOCA) and Request for Comments and the Draft SEIR were distributed to federal, state, regional, and local agencies, community homeowner associations; other interested parties; and libraries; and

WHEREAS, pursuant to State CEQA 21081.6 (Reporting and Monitoring), environmental mitigation measures are defined in the FSEIR, and implementation of the conditions will reduce many of the identified environmental impacts to a level that is deemed to be less than significant; and

Adopt the statement of overriding considerations pursuant to Public Resources Code 21081(a)(3) and CEQA Guidelines 15091(a)(3) for areas of net unmitigated adverse impacts resulting from the proposed project and for which feasible mitigation measures are not available. The FSEIR identifies that as defined by the Southern California Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants. The identified air quality impacts relate predominantly to necessary construction and operational aspects of the landfill project and/or the cumulative development of related projects in conjunction with the proposed project. However, the City has determined that this impact is acceptable because of overriding considerations of public necessity, convenience, general welfare and economic benefits which would result from the proposed project.

NOW, THEREFORE, BE IT RESOLVED, that the Granada Hills-Knollwood Community Plan be amended from Open Space to Heavy Industrial for a 394 acres parcel;

BE IT FURTHER BE RESOLVED that the Final Subsequent Environmental Impact Report, and the Draft Subsequent Environmental Impact Report, State Clearinghouse No. 92041053, has been found adequate to comply with CEQA and City Guidelines relating thereto and, that the City Council hereby adopts the SEIR and the Draft SEIR and instructs that a "Notice of Determination" be filed with the Los Angeles County Clerk and the Los Angeles City Clerk, in accordance with the City Guidelines for the implementation of the California Quality Act, as amended.

RESOLUTION

WHEREAS, the Granada Hills-Knollwood Community Plan was adopted by the City Council on July 10, 1996, after a Community Plan revision with Plan map and text amendments with associated zone changes; and

WHEREAS, an **amendment** to the Granada Hills-Knollwood Community Plan from Open Space to Heavy Industrial and amendments to other applicable elements of the General Plan on an ADDED AREA consisting of a 5-acre, landlocked parcel (Tract 9673) located on the northeast side of the Sunshine Canyon Landfill, westerly of the Golden State (I-5) Freeway, and southerly of the Antelope Valley (SR-14) Freeway interchange is proposed; and

WHEREAS, in conjunction with a proposed plan amendment from Open Space to Heavy Industrial on a 394-acre portion of Sunshine Canyon Landfill, located at 14747 San Fernando Road, Planning staff as part of a Major Plan Review, considered an additional property called ADDED AREA within the immediate area for similar change to the Plan to ensure compatibility of the Proposed Plan designation with surrounding land uses, and to avoid creating a small island of Open Space Plan designation, one of the most restrictive designations, surrounded by industrial and Public Facility uses, the least restrictive designations, and to achieve the intent and purpose of the Granada Hills-Knollwood Community Plan through designating a facility which would promote an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community; and

WHEREAS, the recommended action does not create an industrial/residential conflict because it is not reasonably foreseeable that the Added Area will be developed because it is landlocked with no access, and the property has remained vacant and unused since it was recorded in 1927. Records show that all of the lots in the tract (Tract 9673) were acquired by the State of California in the 1960s for construction of the Golden State (I-5) Freeway. The tract with all parcels tied together was completely enveloped by the Golden State Freeway. In 1983, a Director's Deed from Caltrans was recorded indicating that the property was excess land and landlocked, and given the landlocked nature of this remnant parcel, it no longer meets the definition of a lot under the Los Angeles Municipal Code; and

WHEREAS, the General Plan Advisory Board reviewed the project on January 27, 1999, and seven members advised the Director of Planning for approval of the Plan amendment; and

WHEREAS, a notice of the Public Hearing was published in *The Metropolitan News*, a paper of general circulation, on February 12, 1999, and notices mailed to interested parties; and

WHEREAS, the City Planning Commission conducted a Public Hearing on the ADDED AREA on February 25, 1999, and evidence, both oral and written, was duly presented to and considered by the Commission, including but not limited to a staff report, exhibits, appendices and public testimony; and

Certify, pursuant to California State Public Resources Code 21082.1, Subd. (c)(3) and CEQA Guidelines 15090, that the addendum dated February 5, 1999, prepared by the City of Los Angeles as the lead agency, is adequate for matters related to the Added Area adjacent to the Sunshine Canyon Landfill which is before the City as the responsible agency, that the Addendum reflects the independent judgement of the lead agency, that the information has been reviewed and considered prior to approving the proposed project, and Transmit the Addendum to the City Council for consideration and appropriate action.

NOW, THEREFORE, BE IT RESOLVED, that the Granada Hills-Knollwood Community Plan be amended from Open Space to Heavy Industrial for a 5-acre parcel.

SUMMARY OF KEY GROUP MEETING

- Exhibit No. E-12

**GENERAL PLAN AMENDMENT/ZONE CHANGE REPORT
FOR THE SUNSHINE CANYON LANDFILL PROJECT**

State Clearinghouse Number 92041053

DRAFT SEIR 91-0377-ZC/GPA

Lead Agency:

CITY OF LOS ANGELES

Department of City Planning - Hearing Examiner

221 South Figueroa Street, 3rd Floor

Los Angeles, California 90012

Project Proponent:

BROWNING-FERRIS INDUSTRIES OF CALIFORNIA, INC.

14747 San Fernando Road

Sylmar, California 91342

Environmental Consultant:

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED

6 Jenner, Suite 210

Irvine, California 92618-3811

February 1998

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APPENDICES

Appendix

- A. NOTICE AND PROOF OF PUBLICATION**
- B. MAILING LIST FOR PROPERTY OWNERS/OCCUPANTS WITHIN A 2-MILE RADIUS AND STATEMENT OF MAILING**
- C. REGISTRATION CARDS**
- D. COMMENT CARDS**
 - ▶ Comment Cards Received on November 18, 1997
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- E. AMENDED PROPERTY OWNERS/OCCUPANTS MAILING LIST AND RETURNED NOTICES**
- F. KEY GROUP MEETING/OPEN HOUSE HANDOUT (SEPARATE ATTACHMENT)**

1.0 INTRODUCTION

This report has been prepared by Ultrasystems Environmental Incorporated (Ultrasystems) on behalf of the project proponent (Browning-Ferris Industries of California, Inc.[BFI]) to address verbal and written comments raised on the requested General Plan Amendment/Zone Change (GPA/ZC) for the proposed Sunshine Canyon Landfill Project. It is being submitted to the City of Los Angeles (City) Planning Department and will become part of the application package submitted for the requested GPA/ZC.

The format of the Key Group Meeting/Open House was approved by City staff prior the meeting date. This report responds to comments received during the Key Group Meeting/Open House, which was held on November 18, 1997, and those comments received by the City between November 19 and December 5, 1997. This report is consistent with the Los Angeles City Form CP-7749 "Major Plan Review Key Group Input."

Additionally, this report includes the following information:

1. Notice of Key Group Meeting/Open House and proof of publication
2. Mailing list for property owners/occupants within a 2-mile radius (including statement of mailings)
3. Registration cards
4. Comment cards received at the meeting
5. Comments received between November 19 and December 5, 1997
6. Amended property owners/occupants mailing list and returned notices

1.1 Description of the Proposed Sunshine Canyon Landfill Project

The proposed project consists of the development, operation, maintenance, and monitoring of a Class III, nonhazardous solid waste landfill (herein, City/County Landfill or proposed project). A portion of the proposed City/County Landfill footprint is located on ± 194 acres within the City jurisdiction of Sunshine Canyon and provides an estimated net airspace disposal capacity of 55 million tons. In order to facilitate the design of the City/County Landfill, an additional area of approximately 42 acres within the County of Los Angeles jurisdiction of Sunshine Canyon would be developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the proposed landfill in the City and the operational County Landfill (landfill footprint of ± 215 acres).

Initially, the City and County landfill areas would be operated separately and provide an average capacity of approximately 5,000 tons per day (tpd) in the City and approximately 6,000 tpd in the County. However, within 18 to 24 months following the commencement of landfilling operations in the City, it is anticipated that the City and County landfilling operations would be combined into a single landfill with one working face. This would allow for an average waste intake rate of 11,000 tpd.

The combined development of land within both jurisdictions would result in one landfill footprint being constructed in Sunshine Canyon. The landfill footprint configuration would ultimately encompass ± 451 acres. Ultimate City/County Landfill development within Sunshine Canyon would result in a net waste disposal capacity of 90 million tons (i.e., 55 million tons for the proposed landfill within the City, 18 million tons for the ± 42 acres of new landfill development within the County, and 17 million tons in connection with the already permitted, operational County landfill). This would provide for approximately 26 years of disposal capacity, assuming a maximum daily tonnage of 11,000 tpd. This proposed landfill footprint will abut and encompass ± 80 acres of the existing inactive landfill located in the City, which is in the closure

process. Closure of the existing inactive City landfill is separate from this project and will proceed whether or not the proposed project is approved.

The proposed project requires separate entitlements from the City and County. These jurisdictions will enter into some form of working arrangement to exercise common power over the entire project site. Such an agreement would authorize the joint development and operation of a single landfill within both jurisdictions of Sunshine Canyon. It is anticipated that this approval will be finalized concurrently with project approval. Such an agreement may allow for a combined operation prior to 18 months.

The proposed project includes development and operation of numerous ancillary areas and facilities to support landfilling operations at the City/County Landfill, including an onsite green waste/wood waste recycling area and an environmental learning center. All of these proposed uses would be located within the City portion of Sunshine Canyon and would support the City/County Landfill.

The proposed City/County Landfill would also use ancillary facilities that currently support the existing County Landfill. These facilities include the scale house, scales, administrative offices, caretaker facility, lunchroom/locker storage, maintenance and control buildings, and certain environmental protection and control systems (i.e., leachate treatment plant and storage tanks, surface drainage systems, and water storage tank). The use of these facilities and control systems for landfilling operations would continue until their use is precluded by development on or near the ±42 acres within the County. Development in this area would necessitate the removal and relocation of many of these facilities onto the City portion of the landfill.

The relocation of ancillary facilities, except for the scale house, scales, maintenance and control buildings, and leachate treatment plant and storage tanks, would occur approximately 18 to 24 months or sooner following the commencement of landfilling operations within the City and concurrent with combined landfilling operations being performed at a single working face area in Sunshine Canyon. The removal and relocation of the other facilities (i.e., scale house, scales, maintenance and control buildings, leachate collection and treatment facility and storage tanks, and water tanks) located within the County are expected to occur within a 2- to 3½-year period following commencement of operations within the City.

1.2 Regional Location/Project Setting/Access

The project site is located within the northwest Los Angeles region and within the corporate jurisdiction of the City and County of Los Angeles. The project site is further defined within the Northwest Valley Subregional planning area of the City. The project site is included within the City's Granada Hills-Knollwood Community Plan Area and the Los Angeles County Santa Clarita Valley Areawide General Plan.

The project site address is 14747 San Fernando Road, Sylmar, California. Generally, the project site is surrounded by unincorporated areas of the County to the north and west and the communities of Granada Hills and Sylmar to the south and east, respectively. The project site area includes ±494 acres in the City and ±608 acres in the County. A total ±1,102 acres is owned by the project proponent in and around Sunshine Canyon.

The project site is approximately ¾ mile southwest of the intersection of the Golden State Freeway (I-5) and Antelope Valley Freeway (SR-14) multilevel freeway interchange. More specifically, the entrance to the project site is situated ¾ mile northwest of the intersection of Balboa Boulevard and San Fernando Road in the City.

1.3 Key Group Meeting/Open House Format

On November 18, 1997, two sessions of the Key Group Meeting/Open House for the proposed Sunshine Canyon Landfill Project were held at the North Valley Jewish Community Center in Granada Hills, with the first session commencing at 3:00 p.m. and the second session at 6:00 p.m. The purpose of these meetings was to explain the proposed project in an open house/workshop format and to have technical experts answer questions pertaining to the proposed project.

The following stations were used during these afternoon and evening meetings:

- Station No. 1 Landfill Operations This station's representatives responded to questions regarding proposed landfill operations, prior operational history, and onsite mitigation features.
- Station No. 2 Land Use This station's representatives responded to issues pertaining to discretionary approvals, zoning compatibility, and land use compatibility of the proposed project.
- Station No. 3 Biota This station's representatives responded to issues pertaining to general biota, revegetation, and oak tree resources.
- Station No. 4 Engineering This station's representatives responded to general construction and design features of the proposed landfill, geology, water quality, and other hydrology issues.
- Station No. 5 Environmental This station's representatives responded to general topical issues and specific topics such as traffic, air quality, and human health.

1.4 Notification for the Key Group Meeting/Open House

Area owners and/or occupants were provided notification by mail of the Key Group Meeting/Open House. The notice was sent on November 5, 1997, to approximately 8,100 owners/occupants located within a 2-mile radius of the landfill site. (A copy of this notice is included in Appendix A of this document and a copy of the property owners/occupants mailing list and statement of mailing is included in Appendix B). In addition, a number of presentations were made by BFI, and notices for the Key Group Meeting/Open House were passed out to the following community groups: Granada Hills Chamber of Commerce and its Government Affairs Committee, Reseda Chamber of Commerce, Granada Hills Optimists, Mid-Valley Chamber of Commerce, Federation of Hillside and Canyon Homeowners Association, and United Chambers of Commerce.

Notices were also placed in the *Daily News*, *The Signal*, and *Saugus Enterprise* newspapers and were published on November 12 and 13, 1997. (Copies of the newspaper proofs of publication are included in Appendix A of this document.)

1.5 Attendance of the Key Group Meeting/Open House

A registration station was set up at the entrance of the room where the Key Group Meeting was held, and all attendees were encouraged to sign in. Based on the registration cards completed, approximately 66 individuals attended one or both sessions. (Copies of each registration card are included in Appendix C of this document.) However, some commenters did not fill out registration cards, and some attendees may not have filled out any cards. Based on informal observation, the actual total attendance of both sessions was estimated to be approximately 85 individuals.

1.6 Written Comments Received During the Key Group Meeting/Open House

The following individuals submitted comments on the proposed GPA/ZC for the proposed City/County Landfill at the Key Group Meeting held on November 18, 1997:

Mr. and Mrs. James B. Buehler
Granada Hills, CA 91344
(Refer to Comment 2)

Sherman Klein
North Valley Coalition of Concerned Citizens
Granada Hills, CA 91344
(Refer to Comments 3 and 4)

Sylvia Libis
North Valley Coalition
Granada Hills, CA 91344
(Refer to Comments 5 through 7)

Dora Moss
Granada Hills, CA 91344
(Refer to Comments 8 through 10)

Lorraine Nagy
Sylmar, CA 91342
(Refer to Comment 11)

Jennifer Raisanen
Granada Hills, CA 91344
(Refer to Comment 12)

Vincent and Arlette Rojas
Granada Hills, CA 91344
(Refer to Comments 13 through 15)

Robert Ruhl
Granada Hills, CA 91344
(Refer to Comment 16)

Iris Shah
Knollwood Property Owners Association
Granada Hills, CA 91344
(Refer to Comment 17)

Jonathan Sires
Granada Hills, CA 91344
(Refer to Comment 18)

1.7 Written Comments Received by City Staff (November 19 through December 5, 1997)

The following individuals submitted comments on the proposed GPA/ZA for the proposed project between November 19 and December 5, 1997. These comments were sent directly to the City Planning Department, Hearing Examiner.

Greig Smith
Granada Hills, CA 91344
(Refer to Comment 19)

David W. Mastin
Granada Hills, CA 91344
(Refer to Comment 20)

Wendy Sola Danner
Granada Hills, CA 91344
(Refer to Comment 21)

Mike and Nami Godfrey
North Valley Coalition
Granada Hills, CA 91344
(Refer to Comment 22)

Ernest Hilberg
Granada Hills, CA 91344
(Refer to Comment 23)

James B. Buehler
Granada Hills, CA 91344
(Refer to Comment 24)

Constance Norman
Granada Hills, CA 91344
(Refer to Comment 25)

Anita F. Shald
Granada Hills, CA 91344
(Refer to Comments 26 through 31)

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Martin Levine
Granada Hills, CA 91344
(Refer to Comments 32 through 36)

Joe Sepikas
Granada Hills, CA 91344
(Refer to Comments 37 through 48)

Barbara and Gene Denney
Granada Hills, CA 91344
(Refer to Comments 49 through 50)

A. Ziliak
Granada Hills, CA 91344
(Refer to Comments 51 through 57)

Tom Murphy
Granada Hills, CA 91344
(Refer to Comments 58 through 63)

Charlotte Rodrigues
Granada Hills, CA 91344
(Refer to Comments 64 through 70)

Barbara A. Fine
Barbara A. Fine Consultants
Beverly Hills, CA 90210-2003
(Refer to Comments 71 through 83)

Esther Simmons
Granada Hills, CA 91344
(Refer to Comments 84 through 88)

Hal Bernson
Councilman, 12th District
City of Los Angeles
Los Angeles, CA 90012-4878
(Refer to Comments 89 through 97)

2.0 RESPONSES TO COMMENTS

2.1 Introduction

All written comments received during the Key Group Meeting/Open House (November 18, 1997) and subsequent comments received by City staff (through December 5, 1997) are responded to within this section. Written comments have been alphabetically arranged by the last name of the commenter and responded to in Section 2.2 within this document. In addition, Section 2.3 provides comments and responses received after the Key Group Meeting/Open House by the City Hearing Examiner through December 5, 1997. Verbal comments received at each of the working stations are summarized and responded to by topical issue (e.g., air quality, land use, environmental) in Section 2.4.

2.2 Written Comments Received During the Key Group Meeting/Open House

The following comments were received during the Key Group Meeting/Open House held on November 18, 1997. Copies of the comment cards are provided in Appendix D of this document. All comments that are acknowledged will be forwarded to the City decisionmakers for their review and consideration.

Name Withheld

Comment 1: I can't believe that you could murder my children and destroy my home. I truly hope that you all feel the guilt every night that you go to bed.

Response 1: This comment is noted.

Mr. and Mrs. James B. Buehler
Granada Hills, CA 91344

Comment 2: This meeting was of no value to me. It sounds like everything is a "done deal." It doesn't make any difference what "I", as a citizen, think or how "I", as a citizen, is [sic] affected by dirty air, dirty trash, bad odors, etc. I just don't have the money BFI has!! I'm disgusted!

Response 2: This comment is noted.

Sherman Klein
North Valley Coalition of Concerned Citizens
Granada Hills, CA 91344

Comment 3: How much did you pay to get the council to consider reopening the City side?

Response 3: This comment is noted.

Comment 4: I and my friends have cancer. I have a direct correlation with the locations and the dump. (Direct line of sight and elevation.)

Response 4: As part of the scoping process for the *Sunshine Canyon Landfill Draft Subsequent Environmental Impact Report*, July 1997 (Draft SEIR), comments were received by City Planning staff from concerned individuals pertaining to the potential human health impacts (e.g., incidence of cancer, respiratory ailments and diseases, allergies, skin disorders, and airborne toxins). Most of these concerns were raised by individuals who reside within the Granada Hills area.

In response to these concerns, City Planning staff initiated investigations and had several meetings with leading medical authorities, such as Paul J. Papanek, M.D., M.P.H. (Chief, Toxics Epidemiology Program, Disease Control Programs of the County of Los Angeles, Department of Health Services) and Thomas M. Mack, M.D., M.P.H. (Professor of Preventive Medicine, University of Southern California, School of Medicine). Based on the review of existing information and the advice of these experts, City Planning staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.

Dr. Papanek indicated that the potential for significant human health risk impacts to be statistically attributable to a Class III landfill is generally low. His comments were based on his review of published scientific studies of landfill sites located throughout California.

Dr. Mack, who has designed, researched, and prepared a number of epidemiological studies for hazardous Class I waste landfills, indicated it would be unlikely that an epidemiological study for the proposed project would produce a definitive finding linking health problems of area residents to the landfill site.

Refer also to Response 6 and 29 within this document for an additional discussion of health risks.

Sylvia Libis
North Valley Coalition
Granada Hills, CA 91344

Comment 5: This meeting is worthless. You addressed the whole audience; then separated us to different stations. This is divided [sic] & conquer, showing how little you care for public opinion!

Response 5: This comment is noted.

Comment 6: Why hasn't there been an unbiased health survey as required in your original contract?

Response 6: Refer to the Draft SEIR, Section 4.9, Risk of Upset, pp. 4-314 and 4-315, which discusses issues regarding human health. The Draft SEIR states that the prior health risk assessment prepared for the Ultimate County/City Landfill Project demonstrated that potential environmental impacts on human health would be considered less than significant on the basis of established threshold criteria of public agencies.

Additionally, results of the low-level air quality health risk assessment prepared for the proposed project (see Draft SEIR, Section 4.2, Air Quality, pp. 4-74 through 4-76) and discussions with epidemiological professionals indicate that the proposed project would not create risks to human health if the proposed facility is operated and monitored in accordance with regulatory requirements of various public agencies (i.e., South Coast Air Quality Management District [SCAQMD], Los Angeles Regional Water Quality Control Board [LARWQCB], City of Los Angeles, etc.). Refer also to Responses 4 and 29 within this document for an additional discussion of health risks.

Comment 7: How come an ordinary citizen is put in jail if he cuts down 1 oak tree. You have violated environmental conditions by cutting down over 3,000 oak trees that were hundreds of years old.

Response 7: No County CUP conditions were violated, nor were 3,000 oak trees removed. This is an apparent reference to the removal of oak trees within the County portion of Sunshine Canyon by the project proponent, when the County Landfill was being developed. Removal and mitigation of oak trees within the County was performed in accordance with the provisions of the County Landfill Oak Tree Permit and subject to the monitoring of the County forester. Mitigation for oak trees removed resulted in a 2:1 (replacement: removal) with a guaranteed survival for a five-year period.

The proposed project would result in the direct removal of oak trees located within areas planned for the landfill footprint and ancillary facilities. The removal of these trees would be sequenced during project development. Approximately 564 oak trees (i.e., 545 coast live oak and 19 canyon live oak trees) would be removed. Mitigation for the removal of oak trees will result in these trees being replaced at a 2:1 (replacement:removal) ratio pursuant to the City's Oak Tree Ordinance. Regulatory oversight with respect to mitigation planting is performed by the County forester.

Dora Moss
Granada Hills, CA 91344

Comment 8: I don't want to live in an unhealthy environment. I live off of Balboa and Knollwood. My nephew lives on Titian. Can you honestly say that he will grow up completely healthy? I won't want to swim in my pool anymore.

Response 8: This comment is noted. Refer to Responses 4, 6, and 29 for a discussion of health risks.

Comment 9: My best friend has cystic fibrosis, and if the landfill is expanded, she and many of my friends are moving away.

Response 9: This comment is noted.

Comment 10: If you kill a life, having a child won't bring them back. If you kill 8,000 trees planting 50 more won't bring them back.

Response 10: This comment is noted. With respect to impacts on oak trees, refer to Response 7 within this document.

Lorraine Nagy
Sylmar, CA 91342

Comment 11: I absolutely reject the idea of rezoning to “heavy industry” with its dangerous chemicals (cancer causing) and other hazards that come with this zoning.

Response 11: This comment is noted. Prior to the filing of project applications on the proposed City/County Landfill, the project proponent was informed by the City Zoning Administrator that, for the landfill being proposed, the consideration of a GPA/ZC for the entire ±494 acre project site within City jurisdiction would be preferable to the variance process that had entitled the prior operational City Landfill (1966 through 1991).

The change of land use designation to “Heavy Industrial” and the rezoning of the property to M3 would allow for the proposed landfill project, but conditions of the General Plan Amendment and “Q” conditions (qualified classification) attached to the rezoning would limit the uses on the project site to either those existing uses or those related to the proposed landfilling activities. The “Q” qualified classification may be designated by the City so that the project site would not be utilized for all the uses ordinarily permitted within the M3 zone classification and/or that the development of the site would conform to certain specified standards, if such limitations are deemed necessary, to secure an appropriate development consistent with the objectives of the General Plan and ensure compatibility with surrounding property. (Refer to the City of Los Angeles Planning and Zoning Code, §12.32, J.)

Additionally, the development, operation, maintenance, and monitoring of a Class III landfill would not permit the disposal of hazardous waste. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility. In this regard, a comprehensive hazardous load checking program would be implemented, which would include employees visually inspecting incoming loads at the scale house area, using television monitors and radiation detectors at the landfill entrance, performing random load checks of vehicles, and providing spotters at the active working face of the landfill. Refer to Responses 51 and 110 within this document regarding the City’s requirements of the GPA/ZC.

Jennifer Raisanen
Granada Hills, CA 91344

Comment 12: I didn’t have a problem with proposed expansion. However, I don’t want the zoning changed to industrial. I don’t oppose a variance, leaving the land zoned as agricultural. Once the landfill has closed (26 years) and the waiting period (30 years) end, the land, as agricultural should revert to open-land. I don’t want heavy industrial there, even in the distant future.

Response 12: While the existing inactive landfill in the City portion of Sunshine Canyon was authorized under a zone variance (for a 25-year period [1966 through 1991]), the City determined for the proposed project that a comprehensive GPA/ZC, with appropriate limiting conditions, would be necessary. Refer to Response 11, 51 and 110 regarding the City's likely requirements of the GPA/ZC.

Additionally, a definitive postclosure use of the site has not yet been identified due to the estimated 26-year operational life span and the mandated 30 years of postclosure maintenance. Uses after the postclosure period at the site would be developed in accordance with the requirements of California Code of Regulations (CCR), Title 27, §21190. Any future development of the project site would be consistent with City and County General Plan elements and zoning requirements.

Vincent and Arlette Rojas
Granada Hills, CA 91344

Comment 13: My concern is the proposed area gets too close to houses. 1,700 [sic] feet is not sufficient buffer space.

Response 13: The proposed landfill footprint would be approximately 1,700 feet from the nearest residential home, which is located south of the project site. Most of this distance (approximately one-third mile) is separated by an intervening perimeter ridgeline and portions of the ±100 acre open-space area, which provides permanent open space between the proposed uses (i.e., landfill and ancillary facilities) and existing residential areas within Granada Hills. Refer also to Response 111 within this document.

Comment 14: Not receiving recent mailings on this issue.

Response 14: Area owners/occupants were sent a notice of the Key Group Meeting/Open House on November 5, 1997. Approximately 8,100 owners/occupants located within a 2-mile radius of the landfill site were notified by U.S. Mail (First Class). Listings of these individuals are provided in Appendix B of this document.

In addition, notices were placed in the *Daily News*, *The Signal*, and *Saugus Enterprise* newspapers and published on November 12 and 13, 1997.

The registration cards that were completed at the Key Group Meeting/Open House provided an opportunity for attendees to be added to the mailing list for this proposed project.

Your name and address was included in the Key Group Meeting/Open House notification, and will be included in future mailings for this project.

Comment 15: Request to take tour.

Response 15: This request is noted. The Key Group Meeting/Open House notice provided a telephone number to arrange for a tour of the project site, this number is 800/521-6301.

Robert Ruhl
Granada Hills, CA 91344

Comment 16: I would like a personal tour of the landfill.

Response 16: This request is noted. See Response 15 with respect to arranging a tour of the project site.

Iris Shah
Knollwood Property Owners Association
Granada Hills, CA 91344

Comment 17: What is happening with Bull Creek? Have Ralph call me.

Response 17: Conceptual site plans are being prepared by BFI's consulting forester (Ralph Osterling) for review by regulatory agencies (United States Fish and Wildlife Service [USFWS] and the U.S. Department of the Army Corps of Engineers [Corp]) and the City. Further discussions will be pursued with these agencies and the project proponent with respect to the Bull Creek area. In addition, the project proponent will notify the commenter once these plans are prepared to present those plans and arrange for a tour of the Bull Creek area.

Johnathan Sires
Granada Hills, CA 91344

Comment 18: I am not concerned with the additional dumping at Sunshine as I am with the rezoning. I feel that the rezoning from agricultural to industrial will immediately affect my home's value. I would rather leave the area Agriculture and get another variance to dump.

Response 18: As noted previously, the City has determined that an amendment of the General Plan (to "Heavy Industrial") and a corresponding zone change to "M3" with appropriate conditions (i.e., qualified classification ["Q"]) would adequately limit the proposed and existing uses on the project site. With respect to the "Q" qualified classification, the City would likely provide that the subject property be utilized only for all the uses ordinarily required for the development, operation and maintenance of a landfill and ancillary facilities, rather than allowing other uses generally permitted in the M3 zone classification. The City would also likely require that the development of the site conform to certain specified standards, consistent with mitigations required in the Final SEIR.

The provision and maintenance of a ±100 acre open-space area and intervening ridgeline between the landfill and residential uses would ensure zoning compatibility with surrounding residential property. (See Response 21.) The issues of property values and proximity to the landfill are discussed under Response 117. Additionally, regarding zoning in the immediate area, an M1 zone is located adjacent to the A1 zone to the north of the I-5 Freeway and north of San Fernando Road. This zoning permits warehouse uses and has not affected the rural characteristics of the area. Refer to Responses 11 and 12 for an additional discussion of the zone change.

2.3 Written Comments Received by City Staff Following the Key Group Meeting/Open House

Greig Smith
Granada Hills, CA 91344

Comment 19: How can the City allow this company to reopen in the City, when they were guilty of violating numerous City zoning codes in the past?

Response 19: This comment is noted. A completed summary of the zone variance proceeding is provided in Responses 89 and 91. Any past violations with respect to the zone variance were cured by the project proponent through the appropriate City procedures.

David W. Mastin
Granada Hills, CA 91344

Comment 20: I have no objection.

Response 20: This comment is noted.

Wendy Sola Danner
Granada Hills, CA 91344

Comment 21: We urge you to deny this project as it will be materially detrimental to the residents. If sited, please site the area under a zone variance rather than a zone change, since the land would at some time in the future revert back to open space. The buffer zone should not ever be changed to M-3 as it is next to a residential area.

Response 21: This comment is noted. Refer to Responses 11, 12, and 18 within this document for a discussion of the GPA/ZC.

It should also be noted that even in an M3 zone, subject to City Council approval, the subject property can revert to an open space use, so long as the required 30-year closure/postclosure process has been completed.

The area referred to in this comment as a “buffer zone” is a ±100 acre open-space area that is located directly to the south of the existing inactive landfill. This area was established by the project proponent as an open-space area to separate the landfill from residential areas in Granada Hills. This area was permanently set aside in the early 1980s and serves as an onsite mitigation area. This area also supports various uses (i.e., leased oil wells or associated facilities).¹ Within the area, a voluntary tree-planting program was established by the project proponent, and a diverse variety of native and nonnative trees

¹/ *Final Environmental Impact Report Mitigation Monitoring Summary*, Part VI (A) (B), Ultrasystems Environmental Incorporated, and Conditional Use Permit and Oak Tree Permit 86-312-(5), Condition No. #44. November 30, 1993.

were planted. Currently, over 11,000 trees have been planted, including 1,367 coast live oak trees, which has enhanced the open space area and helped to ensure that no future M3 development would occur. Even with rezoning of the subject property, the open-space area could never be developed into an industrial use because of permanent restrictions. Moreover, this area is proposed for further mitigation planting related to the proposed project. With respect to zoning, the proposed change to an M3 zone would not alter the requirement that this area be maintained as open space.

Mike and Nami Godfrey
North Valley Coalition
Granada Hills, CA 91344

Comment 22: How do we block this zoning change to M-3? This will finally crucify this neighborhood. How can we go on record to protest the dump expansion and the zoning change? BFI has not significantly demonstrated that it is a safe or healthy or necessary project for anyone but BFI. The informational meeting was a scam!

Response 22: This comment is noted. The public has the opportunity to comment as part of the environmental review process and as part of the GPA/ZC proceedings.

The proposed project would provide needed short-, mid-, and long-term disposal capacity for the greater Los Angeles area. (Refer to the Draft SEIR, pp. 2-2 through 2-10).

For additional information, refer to Responses 4, 6, 51, and 89 within this document.

Ernest Hilberg
Granada Hills, CA 91344

Comment 23: What is being done to prevent accidents at Sunshine Dump entrance? What is being done about water following [sic] accross [sic] the road near the entrance. We don't want Sunshine Canyon zoned for Heavy Industry !!

Response 23: It is anticipated that a signal and associated restriping on San Fernando Road near the landfill entrance will be completed by March 1998. Intersection improvements have been made to the landfill entrance (adjacent to San Fernando Road) as a result of developing the County Landfill. These improvements were required pursuant to the Conditional Use Permit (CUP) adopted for the County Landfill. Improvements were also authorized under a "B" permit granted by the City Bureau of Engineering (BOE), Department of Public Works (DPW). Recently, the project proponent sought an interim change authorization to the B permit, that authorization has been received from the City.

With respect to water flowing across San Fernando Road, BFI has constructed drainage improvements near its property boundary, which are part of the landfill entrance improvements developed in connection with the now operational County Landfill.

It should be noted that surface water from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Currently, surface water from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Drainage from this basin travels southerly into a natural drainage channel before reaching the mouth of the canyon near the landfill entrance. From that point, the surface water from the project site flows offsite, underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City BOE. The culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, surface water enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County DPW, Flood Control Division. Surface water then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the Corps.

Your comment is acknowledged with respect to the rezoning of the project site. Refer to Responses 51 and 89 within this document.

James B. Buehler
Granada Hills, CA 91344

Comment 24: BFI was and still is not a good neighbor. Dust, dirt, papers blow over the landfill to my yard all the time. The air has dust/dirt in it that you can see with your eyes from the landfill. Suggest no zoning change for Sunshine Canyon Landfill Project. The landfill is bad for the area. Health, safety, biological resource all effected [sic] badly.

Response 24: This comment is noted. With respect to fugitive dust emissions, refer to Response 98 within this document. Health issues are addressed under Responses 4, 6, and 29, and biological resources are discussed under Section 2.4.3 within this document. Safeguards used at the currently operational County Landfill are described in Response 102.

Constance Norman
Granada Hills, CA 91344

Comment 25: This a letter to let you know that I am outraged that you would even consider putting a dump of this magnitude so close to residential neighborhoods. This dump is also right next to our city water supply. We are already being polluted with the existing landfill (along with all of the other pollutants in the San Fernando Valley). I love my beautiful neighborhood, but if this plan goes through, I will be forced to move to another area (as far away from the dump as I can get!). I will not stay here and be poisoned. I plan to do everything in my power to fight this.

Response 25: This comment is noted. The proposed landfill footprint would be approximately 1,700 feet from the nearest residential home, which is located south of the project site. There is a ±100 acre buffer area, which provides open space between the proposed uses (i.e., landfill and ancillary facilities) and existing residential areas within Granada Hills.

With respect to the absence of any potential groundwater impacts on the Los Angeles Reservoir and the Los Angeles Aqueduct Filtration Plant, refer to Response 30.

Refer also to Response 111 with respect to separation distance of the project site from uses within the Granada Hills community.

Anita F. Shald
Granada Hills, CA 91344

Comment 26: As a resident of the Knollwood Community I strongly object to extending the Sunshine Canyon Landfill.

For years we put up with the trash trucks speeding down San Fernando Road, spilling out their exhaust in big puffs of black smoke while belching trash from the top to land along the roadways cluttering the street. Plus the traffic itself backing up the roads making it more difficult to commute to and from work.

Response 26: This comment is noted. San Fernando Road is classified as a major highway, which is a four-lane roadway (two travel lanes in each north/south direction) with a posted speed limit of 45 miles per hour (mph). Near the landfill entrance, San Fernando Road is located west of and generally parallel to the I-5 Freeway. North of the SR-14 Freeway, San Fernando Road continues as The Old Road.

Signage is currently posted near the landfill entrance for the operation of the County Landfill and states the following requirement:

TARPS ARE REQUIRED: The State of California Vehicle Code Section 23115 requires all vehicles hauling refuse or recyclables to be totally covered to prevent spillage from the vehicle. This code will be enforced by \$100.00 fine being imposed after the first warning.

Drivers of waste-hauling vehicles who violate the mandated tarping requirement are given a notice by the project proponent that states the following requirement:

TARPING VEHICLE CODE REQUIREMENT: The following tarping vehicle code will be enforced at the Sunshine Canyon Landfill. First offenders will be warned a second time, and multiple offenders will be fined \$100.00 per offense.

Additionally, pursuant to Section 23114 (a) of the California Vehicle Code, no vehicle shall be driven or moved on any highway unless the vehicle is so constructed, covered,

or loaded as to prevent any of its contents other than clear water or feathers from live birds from dropping, shifting, leaking, blowing, spilling, or otherwise escaping from the vehicle. In addition, Section 23115 states that no vehicle loaded with garbage, swill, cans, bottles, wastepapers, ashes, refuse, trash, or rubbish, or any noisome, nauseous, or offensive matter, or anything transported to a dump site for disposal shall be driven or moved upon any highway unless the load is totally covered in a manner which will prevent the load or any part of the load from spilling from the vehicle.

Large-volume customers currently comply with these requirements that are imposed by the project proponent at the County Landfill. If these large-volume customers become a problem there is a mechanism (via their existing contract) to enforce a fine(s). Also, the project proponent is working with the County LEA to develop a system for small haulers, which would encourage them to use proper tarping.

Currently, the project proponent provides clean-up along new San Fernando Road and its frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard and within O'Melveny Park.

Both San Fernando Road and the internal access roadway are designed to have adequate queuing lanes for vehicular traffic accessing the landfill entrance and the onsite scale house area. Truck traffic will not be allowed to queue on San Fernando Road during the operational hours of the landfill.

It should also be noted that since the County Landfill has become operational (August 1995), truck queuing on San Fernando Road has not been a problem. With respect to the County Landfill, improvements have occurred at both the landfill entrance and along the existing access roadway. These improvements were granted in March 1996 by the City's Bureau of Engineering and authorized under a "B" permit. Improvements included the construction of a right-turn lane at the landfill entrance for vehicular traffic merging onto San Fernando Road and restriping improvements. Internal access road improvements were implemented in the summer of 1996 in response to the City's approval of a grading permit. Those improvements included the installation of drainage improvements, grinding and removing the existing asphalt road, importing aggregate subbase material, and importing asphalt for resurfacing of the access roadway consistent with project specifications.

It should be noted that the improved roadway through Sunshine Canyon to the City/County jurisdictional boundary is approximately 1 mile long and provides a ROW of 160 feet, with easements for berming and drainage. For an additionally discussion of this issue, refer to the Draft SEIR, Section 4.13.5, Access Roadway in Sunshine Canyon, pp. 4-380 through 4-382.

The project proponent has never received any violations from the CHP or notification from the City regarding the issue of truck(s) impacting San Fernando Boulevard.

Comment 27: We were thrilled when we worked together to get the dump closed, only to have it reopen in the past year and are faced with the same problem.

Response 27: This comment is noted.

Comment 28: In addition to the above, the air itself is polluted. There is a fine sifting of dirt that wafts down settling on everything, patio furniture, pools, even the leaves on the plants.

Response 28: The project proponent proposes to implement numerous mitigation measures described in the Draft SEIR (pp. 4-86, 4-88, and 4-90) to ensure that fugitive dust from the project site will not migrate into residential areas located near the project site. These measures include the daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads to minimize dust lofting from construction disturbances. Construction areas will receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days during the windy season. As referenced under Response 98, numerous mitigation measures would be implemented to minimize dust generation as a result of landfill operation.

It should also be noted that fine dirt is likely generated as a result of other construction activities occurring in the immediate vicinity of the landfill. Industrial developments include Sunset Farms located east of the project site and the Metropolitan Water District (MWD) treatment plant located south of the project site. In addition, the Caltrans cut-slope areas, which parallel the northbound/southbound lanes of Interstate 5 have been left in a denuded state since freeway construction was completed. All of these potential sources in addition to the natural mountainous terrain of the immediate area surrounding the Granada Hills community can contribute to potential fugitive dust emissions.

Comment 29: Then there is the health risk. I developed asthma while the dump was in operation. During the past few years it had gotten better. Now with the dump once again open I have had to go back on medication. I definitely feel there is a correlation between the two.

Response 29: Refer to Responses 4 and 6 regarding health risks. Currently, no regulatory agency such as the SCAQMD or the County Department of Health Services has determined that any health risk exists onsite or offsite due to operation of the Sunshine Canyon Landfill Extension. With respect to the proposed project, Section 4.2.9, Health Risk Analysis, of the Draft SEIR provided detailed information on potential health risks associated with development of the proposed project. That analysis concluded that the cumulative maximum individual cancer risk is 0.0182 in 1 million, as compared to a significant threshold of one in 1 million. The cancer risk to the maximum exposed individual is substantially below any level of concern based on conservative (i.e., over predictive) assumptions. With less restrictive input assumptions, the cancer risk would have been even lower.

Results of the SCREEN 2 impact assessment compared to the SCAQMD significant criteria thresholds in Rule 1303 resulted in all pollutants having less than significant impacts when conservative assumptions were utilized.

In addition to individual cancer risk impacts, the toxic air contaminants (TACs) listed in the Draft SEIR, Table 4.2-13, were modeled for potential chronic health risks using the hazard index recommended by the California Air Pollution Control Officers Association (CAPCOA). The chronic health impact predicted in the health risk assessment is

0.0000409, or under conservative impact assumptions, the level is less than 0.001 percent of the significant threshold of a hazard index significance level of 0.5 recommended by CAPCOA. Similarly, acute health risk impacts are predicted at 0.0000292, with a hazard index of 0.5 being a potentially significant impact. Based on the results of the SCREEN 2 dispersion modeling identified in the risk assessment, both chronic and acute health risks (using the CAPCOA hazard index) were clearly considered less than significant. Results of flaring the landfill gas (LFG), both in terms of TACs and criteria air pollutants, would also have a less than significant impact.

Comment 30: Then we come to the risk of the Van Norman dam and waterway. Seepage from the dump will certainly happen in time. In the event of another earthquake, it could rupture and penetrate.

Response 30: The Los Angeles Reservoir is located south of the Los Angeles Aqueduct Filtration Plant, approximately 2 miles southwest of the project site. The Los Angeles Reservoir was built in 1977 to replace the nearby Lower Van Norman Reservoir, which was damaged in the 1971 Sylmar earthquake and served as the primary storage for Los Angeles Aqueduct water. This reservoir has lined sides and a compacted earth fill dam. Due to the distance of this reservoir from the project site, it is not physically possible for any seepage from the landfill to reach or penetrate the reservoir.

In addition to distance, Los Angeles Reservoir is protected from any potential impacts because subsurface water in Sunshine Canyon is effectively hydraulically separated from the San Fernando Valley alluvium by the low-permeability bedrock. Groundwater flow in the bedrock is not continuous between the canyon and valley floor area.

After independently reviewing published hydrogeologic reports for the Sunshine Canyon area, the Watermaster for the Upper Los Angeles Basin Area concluded that, other than through the alluvium, there was no groundwater connection between Sunshine Canyon and the San Fernando Basin. The Watermaster also concluded that the natural bedrock material underlying the canyon is of low permeability and has low storage capability.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill.

Comment 31: Why can't anyone see what is happening to our area? Property values are down due to the dump. Expanding it will only contribute to the decline. We have had our share. Let someone else or some other area put up with a landfill in their back yard. Let's restore Granada Hills to its natural beauty with the lovely oaks and clean streams. Not a contaminated area that no one wants to live in.

Response 31: A residential valuation study prepared by Dr. Chapman Finley of JurEcon, Inc., for the Sunshine Canyon Landfill County Expansion entitled *An Evaluation of the Sunshine Canyon Landfill's Impact on the Value of Homes in Adjacent Residential Neighborhoods*

(November 1988) was provided in the *Draft Environmental Impact Report, Sunshine Canyon Landfill Extension, Responses to Comments*, Volume A, Appendix 7. Based on this study, which compared neighborhoods adjacent to the project site with four similar residential areas located at specified distances from the site, it was determined that the existing inactive landfill (when operational) had no discernible economic impact on property values in the immediate area. A similar study was conducted for the Puente Hills Landfill during its environmental review. Findings of that study concluded that property values near that landfill were not impacted as a result of landfill development or operation. Results of both of these studies were summarized in the Draft SEIR, Volume II, Appendix C14.

Martin Levine
Granada Hills, CA 91344

Comment 32: I am opposed to any zone change which will allow BFI, the operators of the Sunshine Canyon Landfill to deposit solid waste located on 194 acres within the City of Los Angeles and 42 acres within the County of Los Angeles.

Response 32: This comment is noted.

Comment 33: I bought my house two years ago with the intention of living in a safe and healthy area during my retirement. I have suffered from asthma most of my life and was under the impression that this area was outside of the smog belt of metropolitan Los Angeles. If the zoning change is approved and I am forced to move to a more desirable area for my health, the presence of the Landfill will depress the value of my property with a considerable loss of money to me.

Response 33: This comment is noted. Granada Hills is located in the County of Los Angeles within the South Coast Air Basin (SCAB). The SCAB presently exceeds State and federal standards for the following criteria air pollutants: carbon monoxide, nitrogen dioxide, ozone, and particulate matter less than 10 microns in diameter. In this regard, Granada Hills like many Southern California cities is in a non-attainment air basin for the above-listed criteria air pollutants.

The issue of property values being adversely affected by the proposed project is discussed under Responses 31 and 117 within this document. This issue was also discussed in the Draft SEIR, Section 4.11, Housing. With respect to health risks, this issue is discussed in Responses 4, 6, and 29, respectively.

Comment 34: I was given a tour of the Landfill site by employees of BFI. I was told some eleven hundred (1100) trucks a day would drive to the Landfill to deposit solid waste. That would account for 85 trucks per hour (more than 1 truck per minute) during the 13 hours the Landfill will operate. This increase in traffic alone would contribute significantly to the decline in the quality of the air in this neighborhood in addition to increased traffic congestion and noise.

Response 34: The proposed project (within the City portion of Sunshine Canyon) is anticipated to generate a total of 1,180 trip ends, with 1,110 of the trip ends being truck trips (i.e., transfer trucks and collection vehicles). A trip end is defined as one-half of the vehicles arriving and one-half departing, or a complete daily trip. Within this total, the project would generate 129 trips during the a.m. peak hour and 150 trips during the p.m. peak hour. (This forecast is based on the maximum daily intake tonnage of 5,500 tpd.) With respect to the existing operational County Landfill, the project would generate 405 trips during the a.m. peak hour and 480 trips during the p.m. peak hour. (This forecast is based on the maximum daily intake tonnage of 6,600 tpd.) Additionally, a list of cumulative trip generation (from 33 related projects) is provided in the Draft SEIR, Table 4.13-5, Trip Generation for Related Projects, pp. 4-355 through 4-358.

Mitigation measures that would reduce cumulative impacts resulting from development of the proposed project were identified in the Draft SEIR, Section 4.13. These measures are intended to offset the cumulative impacts due to project implementation. As shown in the Draft SEIR, all cumulative traffic projected is not expected to impact either local area streets or freeway systems within the region on either a project-specific basis or cumulative basis with the implementation of these mitigation measures. No significant impacts are anticipated as a result of project implementation.

Mobile source emissions from motor vehicle exhaust would be generated by project traffic. The estimated number of trucks necessary to deliver the intake amount was included in Appendix B1 within the Draft SEIR. Based on the traffic study, as many as 220 transfer trucks, 640 curbside collection trucks, and 250 local delivery trucks will transport refuse to the project site on a daily basis. Additionally, up to 87 employees are anticipated to commute to the project site.

As defined by the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants (i.e., nitrogen oxides [NO_x], reactive organic gases [ROG], and suspended particulate matter [PM₁₀]) due to project implementation. Regional emissions of all criteria pollutants (i.e., carbon monoxide [CO], NO_x, ROG, sulfur oxides [SO_x], and PM₁₀) will decrease by reduced mileage traveled within the South Coast Air Basin. Emission levels for CO and SO_x are projected to remain below their applicable threshold levels. Furthermore, CO emissions are not projected to exceed either State or federal ambient air quality standards or create "hot spots."

With respect to the proposed project, impacts on air quality within the South Coast Air Basin (SCAB) would be minimized by providing additional disposal capacity within the Los Angeles region, thereby reducing emissions from transporting refuse longer distances (i.e., either to existing landfill facilities located farther distance or transporting waste-by-rail to remote landfill facilities).

Comment 35: This Landfill site is located less than a mile from the Los Angeles County's major residential water treatment facility. Common sense would indicate a threat to the water supply for possible contamination.

Response 35: Refer to Responses 30 and 42 within this document for a discussion of these issues.

Comment 36: Please consider these factors and deny the request of BFI to have a zone change and preserve a clean, safe and healthy neighborhood for the residence [sic] of this area.

Response 36: This comment is noted.

Joe Sepikas
Granada Hills, CA 91344

Comment 37: As a citizen living in the shadows of Sunshine Canyon Landfill, I would like to voice my concerns and have the following issues addressed before the City “rubber stamps” the BFI/Sunshine Canyon General Plan/Zone Change currently being proposed along with some other unresolved issues when this same landfill was officially closed in 1991:

What steps are/have been taken to test and monitor leaching or subterranean drainage from the old landfill into our groundwater supplies? (Everyone is concentrating on the permit to enlarge operations and no comments re this old, unlined landfill.)

Response 37: Currently, 22 monitoring wells monitor the existing groundwater conditions and groundwater quality at the project site. Of the 22 wells installed, 13 specifically monitor possible offsite pollution migration from the existing inactive landfill. Currently, as required by the LARWQCB, groundwater is sampled and analyzed quarterly. In addition to the monitoring wells, a groundwater extraction trench is located across the bottom of Sunshine Canyon to effectively cut off any possible groundwater migration.

The LARWQCB reviews and revises Waste Discharge Requirements (WDRs) for all active Class III sites to ensure consistency with revised CCR, Title 27, Chapter 3, Subchapter 3, Article 1 (SWRCB-Water Quality Monitoring and Response Programs for Solid Waste Management Units), §§ 20380 through 20435, which requires upgrading of groundwater monitoring systems to identify water quality degradation. Title 27 regulations supersede Title 14 and Title 23 regulations for solid waste landfills as of July 1997. Previously, Article 5 of Chapter 15, adopted in 1991, specified new guidelines for the siting of groundwater monitoring wells around all active landfills. In addition, the U.S. Environmental Protection Agency (USEPA) issued 40 Code of Regulations (CFR), Parts 257 and 258, “Subtitle D” (or Solid Waste Disposal Facility Criteria) in 1991, which uniformly applies additional requirements to landfill operators. The LARWQCB adopted Order No. 93-062 in September 1993, which requires all regional landfills to comply with these federal regulations.

The LARWQCB also administers the Solid Waste Assessment Test (SWAT) Program pursuant to the California Water Code (CWC) § 13273 that requires landfill owners of active or inactive nonhazardous landfills to evaluate possible migration of hazardous wastes or leachate from their facility. In addition to requiring site evaluations, the SWAT Program provides deadlines for implementation of water quality monitoring systems at active solid waste disposal sites, requires water quality monitoring systems at many closed solid waste landfill sites that previously had none, and requires identification of leaking sites for verification monitoring or remedial actions under CCR, Title 27, Chapter 3. Upon approval by the LARWQCB, landfill operators must collect groundwater

monitoring data during four consecutive quarters and submit that data in a SWAT report. SWAT reports must include an analysis of both surface and groundwater on, under, and within a 1-mile radius of the landfill site to provide a reliable indication of whether there is leakage.

Comment 38: Will BFI/The City of Los Angeles ever enforce the old contractual promise of BFI that when the old landfill was closed (in 1991) that the area would be covered and reforested? (This still has never been done and apparently is being ignored by all the presently involved parties).

Response 38: The Final Closure and Postclosure Maintenance Plan for the Sunshine Canyon Landfill (FCPMP) was initially prepared by consulting engineers and submitted to regulatory agencies (California Integrated Waste Management Board [CIWMB], LARWQCB, City Local Enforcement Agency [LEA]) on November 30, 1990, for their review. That document was subsequently revised in response to comments received by those agencies and the public. That plan was also resubmitted to agencies on April 19, 1991 (First Revision), April 30, 1992 (Second Revision), November 18, 1994 (Third Revision), and March 1997 (Fourth Revision). The final plan is pending approval by the City LEA.

Upon FCPMP approval, a revegetation program would establish a permanent grass and legume cover for erosion and dust control. Revegetation of disturbed areas is intended to reestablish vegetation and provide a natural appearance to blend in with the surrounding topography and establish habitat for wildlife. Native and nonnative seed mix would be applied on areas of the inactive City landfill. It is anticipated that the vegetative cover would eventually evolve into a mosaic of shrubs interspersed with native annual grasslands.

With respect to the duration of processing the FCPMP and other documents such as the Draft SEIR, it should be noted that following the approval of the County Landfill by the County Board of Supervisors in February 1991, both the North Valley Coalition of Concerned Citizens (NVC) and the City of Los Angeles filed separate lawsuits on March 22, 1991, in the Superior Court, against the County and BFI, challenging the project entitlements approved by the County, the legal sufficiency of the FEIR, and the amendments to the County's General Plan. These lawsuits were eventually consolidated by the court, and the trial on this matter commenced in October 1991. After a lengthy trial, a judgment was granted by the trial court in 1992. Following that judgment, several appeals and subsequent action by the County were undertaken. Needless to say, the litigation on the County Landfill Project for both the petitioners and respondents was very lengthy. Matters were finally resolved between the parties in September 1994. Refer to the Draft SEIR, Appendix C3, Overview of Litigation Proceedings in Connection with the County Landfill for a detailed discussion of the litigation proceedings involving the County Landfill.

Unfortunately, during the ongoing litigation between the City and County (with respect to this project), processing of documentation in the City was deferred.

Comment 39: How can the City of L.A. reconcile its own prior E.I.R. report that "any increase in usage of the Sunshine Canyon Landfill will have a 'detrimental or irreparable' harm and impact

on the local community.” (If the City grants this zone change, what steps will be taken to protect the “local community” from these “harms” and if not, who shall bear the liability?)

Response 39: The source of this comment is unknown. The Draft SEIR analyzed numerous topical issues specific to the proposed project. That document concluded that except for air quality, the development of the proposed project would not have any significant impact on the environment. The project proponent will comply with all SCAQMD rules and regulations pertaining to air quality matters. In addition, numerous mitigation measures were provided in the Draft SEIR that will become conditions of project approval and monitored by various regulatory agencies, including the City. Refer to Response 90.

Comment 40: How far into the residential community will this “zone change” take place and why does such a drastic zone change need to take place from “open space” to the exact opposite “Heavy Industrial”? Any limitations possible on the overboard “Heavy Industrial” usage permits?

Response 40: The zone change will not affect any residential areas within Granada Hills. The area of rezoning will only include the property (±494 acres) owned by the project proponent. Refer to Responses 11, 51, 89, and 110 for a discussion of why the GPA/ZC are being requested and information pertaining to the GPA/ZC request. Refer to Response 90 for a discussion of conditions of approval and monitoring agencies for the proposed project.

Comment 41: What increased safeguards will be taken to protect nearby residents from brush fires due to increased operations? (We had a fire through here about 8 years ago from Sunshine Canyon Landfill when operations were minimal.)

Response 41: As stated in Section 4.14.1, Fire and Emergency Medical Services, p. 4-398 of the Draft SEIR:

“The threat of a fire igniting onsite and then spreading offsite would be considered rare because most areas around the landfill, especially the landfill footprint area, have combustible vegetation removed and are graded. The landfill footprint area would create a firebreak since existing surficial vegetation is removed. Unless authorized, onsite areas such as the ±100 acre . . . [open space] area and other natural areas in Sunshine Canyon are considered off limits to landfill personnel.”

It is proposed for the project site that small onsite brush fires would be controlled by using landfill equipment such as dozers, scrapers, and water trucks. Water flow to the project site (including water tanks, fire hydrants, and water lines) would meet the requirements of the Los Angeles Fire Department (LAFD). Control of offsite brush fires would be the responsibility of either the LAFD or Los Angeles County Fire Department (LACFD). However, landfill equipment would be made available to these departments during offsite brush fires. If necessary, the inactive landfill top plateau could be used as a staging area for either LAFD or LACFD helicopters making water drops to combat offsite brush fires.

The December 1988 fire did not start within the boundaries of Sunshine Canyon, and the cause of the fire remains undetermined. Onsite landfill personnel and equipment prevented the fire from encroaching upon the southern berm of the existing inactive landfill.

Comment 42: Due to the unique extremely high wind conditions in this area, what will be done to test or retest airborne particulates from the landfill site into nearby Van Norman water supply for the City let alone the local residents?

Response 42: With respect to the contamination of the water supply from high wind conditions at the Joseph Jensen Filtration Plant or the Los Angeles Reservoir, these facilities are respectively located approximately ½ mile and 2 miles southwest and downgradient of the project site. Both facilities are separated from the project site by elevated ridgelines; a ±100 acre landscaped, open-space area; several residential developments; and existing industrial facilities. Since the 1950s, the Sunshine Canyon Landfill has operated within this area and is contained below existing perimeter ridgelines. The landfill has never been a documented source of water contamination in either facility.

Both the owner/operator of the Los Angeles Reservoir (i.e., City of Los Angeles, Department of Water and Power [DWP]) and Joseph Jensen Filtration Plant (i.e., MWD) have stringent testing and monitoring procedures in place to ensure that water supplies in the reservoir will not be affected by any potential airborne contaminants.

Comment 43: Regarding the BFI EIR report, the “Human Health/Risk of Upset” sections concludes “toxic source emissions and migration of contaminants are basically unavoidable and local residents will be subjected to these constantly over the life of the landfill.” What steps does the City and BFI propose to compensate the residents nearby for the loss of health, etc? What about other City residents who drink the water far away?

Response 43: The information expressed by the commenter regarding human health issues is unfounded and is not included in the Draft SEIR. The prior health risk assessment prepared for the Ultimate County/City Landfill Project demonstrated that potential environmental impacts on human health would be considered less than significant on the basis of established criteria of public agencies. Results of the risk assessment yielded a 70-year excess cancer risk level (of 1.59×10^{-8}), which is far below the SCAQMD-designated acceptable level (1.0×10^{-6}) as outlined in SCAQMD Rules 212 and 1401.

Results of the low-level air quality health risk assessment prepared for the proposed project (refer to the Draft SEIR, Section 4.2.9, Health Risk Analysis) and discussions with epidemiological professionals indicated that the proposed project would not create risks to human health if the proposed facility is operated and monitored in accordance with regulatory requirements of various public agencies (i.e., SCAQMD, LARWQCB, City of Los Angeles, etc.). For further discussion and updated analysis of air quality impacts associated with the proposed City Landfill, refer to Section 4.2, Air Quality, of the Draft SEIR.

Refer to Responses 30 and 42 for discussion of water quality issues.

Comment 44: How in blazes could the City/County determine the [sic] Towsley Canyon was not feasible to develop when it would have provided more acreage for landfill purposes and is in a more remote area?

Response 44: The Towsley Canyon Landfill site was originally included as a proposed new Class III landfill in the Solid Waste Management Status and Disposal Options in Los Angeles County and the Los Angeles Countywide Siting Element. However, in June 1997, the County Board of Supervisors determined that this site was no longer considered feasible to develop, due in part to the acquisition of key parcels in and around the project site by the Santa Monica Mountains Conservancy for future park development (i.e., Santa Clarita Woodlands Park). Additionally, the majority of the planned Towsley Canyon Landfill footprint area would have been within the ownership of the Conservancy.

Comment 45: Similarly, the Mission/Rustic-Sullivan Landfill was also summarily dismissed as not a feasible alternative but no real convincing reasons stated why?

Response 45: The Mission/Rustic-Sullivan Canyons site was not included in the Draft SEIR analysis because it was not included in either the County or City Source Reduction and Recycling Element (SRREs) as either a planned or potential solid waste disposal facility. As stated in the *Los Angeles County Countywide Siting Element, Volume I, The Element* (June 1997), p. 7-5:

“Also, existing Federal law (Public Law 98-506) prohibits the siting of new landfills within the boundary of any unit of the National Park System. Since the Mission/Rustic-Sullivan Canyons are located within the area designated as the Santa Monica Mountains National Recreation Area, which is a unit of the National Park System (Public Law 95-625), the use of these canyons for a landfill site is in conflict with Public Law 98-506. Therefore, these canyons have been removed from further consideration.”

Additionally, the *Lopez Canyon Sanitary Landfill, Draft Supplement to the 1991 Subsequent Environmental Impact Report*, prepared by the City Department of Public Works, Bureau of Sanitation, stated that for the Mission/Rustic-Sullivan Canyons site, “development of these canyons is no longer considered a feasible alternative.”²

Comment 46: If out of state landfills are not feasible due to cost reasons, how does the City/County justify the additional distances travelled [sic] by garbage trucks who [sic] pass by from the Westside everyday, the unused but already prepared canyon just south of the 405 Freeway near ----- citizens to not have the dump in their backyard or give us local citizens some financial or other relief who have had to bear the landfill in our backyard for over 30 years now; distribute the burden!!

^{2/} *Final Supplement to the 1991 Subsequent Environmental Impact Report, Lopez Canyon Sanitary Landfill, Volume 1: Operation Through 2001*, City of Los Angeles, Department of Public Works, Bureau of Sanitation, p. 6-5. April 1995.

Response 46: These out-of-State remote landfill facilities were not considered as feasible alternatives to the proposed project because of their distances from City and County-generated wastes and the fact that the use of these facilities would not substantially lessen or avoid significant environmental impacts in comparison to the proposed project. Numerous environmental and economic reasons were stated in the Draft SEIR, Section 1.0, Summary, pp. 1-13 and 1-14. The re-opening of closed landfills (i.e., Mission/Rustic-Sullivan Canyons, located south of the I-405 Freeway) are not considered feasible alternatives to the proposed project by the City. The concerns of the commenter are however noted.

Comment 47: Use Blind Canyon and/or Elsmere Too!! Will the many new trucks run on new cleaner fuels or on polluting diesel? Will there be a full-time monitor for air, water and safety issues before fire, pollution and toxic damages occur? Will a final close/"never to reopen date" ever be given? (As was done before we moved in and now has been reneged?)

Response 47: One potential (i.e., Blind Canyon) and one proposed (i.e., Elsmere Solid Waste Management Facility) landfill site may be developed within Los Angeles County pursuant to adopted integrated waste management plans of the County. These landfill facilities are located in unincorporated areas of the County, and each facility has the potential for a daily intake rate of 16,500 tons.

The Draft SEIR indicated that the 220 transfer trucks and 640 refuse collection trucks are anticipated to travel approximately 34,280 miles per day. Based on an average fuel consumption of 5.9 mpg predicted in the *SCAQMD CEQA Air Quality Handbook* (Table A9-5-O), an estimated 5,810 gallons of fuel may be used daily. All of these vehicles are assumed to use diesel fuel.

Currently, the project proponent provides qualified personnel to staff the landfill facility and effectively and promptly address matters of operation, maintenance, environmental controls, records, emergencies, health, and safety. In addition, there is a resident caretaker located onsite 24 hours. The proposed project will also be monitored by various State, regional, and local agencies as described in Response 90.

The ultimate combined City/County Landfill would be designed for long-term use (approximately 26-year operational site life) and a minimum 30-year mandatory closure and postclosure maintenance period. The total life span, including operation, closure, and postclosure maintenance, would be a minimum 56 years.

Any future operation beyond this time period would require additional approvals by the respective jurisdictions.

Comment 48: Finally, its a travesty that former councilwoman Joan Milke-Flores is the chief lobbyist for BFI and obviously influences the present Board of Supervisors. Have some ethical and moral integrity and do not be swayed by BFI lobbying. Look seriously at all the issues and consider the unique environmental, ecological and seismic damages that exist at this landfill site without pressure politics for once.

Response 48: This comment is noted. The primary BFI-registered lobbyist with the City of Los Angeles and County of Los Angeles is Arnie Berghoff, Divisional Vice President of Government Affairs. Joan Milke-Flores is a registered lobbyist for BFI with the City and assists Mr. Berghoff. Both Mr. Berghoff and Ms. Flores comply will all applicable laws in these respective jurisdictions.

Barbara and Gene Denney
Granada Hills, CA 91344

Comment 49: We protest the proposal to change the zoning in our area from Open Space to Heavy Industrial (from A1-1-O to M3-1-O). Consider the impact of what this proposed zone change would entail-increased tonnage from all over the city and county into Sunshine Canyon!

Response 49: The proposed zone change would initially permit an average daily disposal capacity of 5,000 tpd in the City portion of Sunshine Canyon. Currently, the County portion of Sunshine Canyon is permitted to accept 6,000 tpd and, as of December 1997, received an average of 4,000 tpd. The impacts of this zone change and the proposed project were thoroughly analyzed in the Draft SEIR. The zone change is also proposed to more accurately reflect existing conditions on the project site, including an inactive landfill that will be undergoing closure and postclosure maintenance and the operating County Landfill adjacent to the proposed project. The proposed project will provide needed short, mid-, and long-term disposal capacity within the Los Angeles region (refer to the Draft SEIR pp. 2-2 through 2-10). Based on disposal capacity projections, the closure of existing landfills, and limited siting of new landfills, a disposal capacity shortfall is projected to occur under current conditions.

Comment 50: Please deny the discretionary actions requested by BFI.

Response 50: This comment is noted.

A. Ziliak
Granada Hills, CA 91344

Comment 51: I recently attended Browning Ferris Industries Key Group Meeting about the proposed Zoning change of their Landfill site form [sic] Open Space to Heavy Industrial. I was completely shocked when Mr. Chris Funk announced that it was the City Zoning that suggested that this area be rezoned.

Response 51: Prior to the filing of project applications on the proposed City/County Landfill, the project proponent was informed by the City Zoning Administrator that, for the landfill being proposed, the consideration of a GPA/ZC for the entire ±494 acre project site within City jurisdiction would be preferable to the variance process that had entitled the prior operational City Landfill (1966 through 1991). The City did not propose the zone change; it simply determined that such an entitlement process would be superior to the previous

zone variance. Additionally, prior to the filing of the current application, in December 1990, John J. Parker, Associate Zoning Administrator, stated the following:

“In the opinion of the Administrator, no future entitlements with respect to Sunshine Canyon Landfill should be considered under a zone variance process. The findings for a zone variance do not speak to the merits of the project, but more directly to hardships, special circumstances and property rights, which are arguably not the most appropriate findings for this type of case.”

Mr. Parker went on to say that a change of both the zone and General Plan designation on the property to a (Q) M3 Zone and a Heavy Industry use designation would be a more appropriate discretionary entitlement.

Comment 52: I was also surprised when Mr. Funk insisted that this meeting be held without an open question and answer period and he added it was the City’s idea that the meetings be conducted this way.

Response 52: Prior to the initiation of the Key Group Meeting/Open House, several discussions were held with representatives from City Planning about the proper format for the meeting. The project proponent and City Planning staff agreed to the ultimate format, including two sessions with brief introductory presentations and the use of working stations (grouped according to key issues) to ensure that all attendees would have the opportunity to comment and receive answers about the proposed GPA/ZC.

Comment 53: I have to say I am deeply disappointed if this is true. As you well know B.F.I. has committed so many violations and has blatantly disregarded the Zoning Administrator and Zoning Commissioners. Just one example of this can be seen by looking back at The Board of Zoning Appeals Transcript of a hearing on November 12, 1991. At this hearing an attorney for B.F.I. essentially told the Commissioners that B.F.I. would not meet the conditions that the Zoning board required because they were too costly. One Commissioner responded that this attorneys argument did not make much sense because B.F.I. had spent so much money on attorneys and lobbyist etc.

Response 53: This comment is noted. Refer to Response 91 within this document for a discussion of this issue.

Comment 54: There are so many conditions that B.F.I. has not complied with I can not believe that any zoning change could be granted. Here are a few that I can think of at this moment,

ZA M804 (ZV) 1966 Condition #8 and #14
BZA 1632 1966 Condition #2 A
ZA M804 Revocation hearing (RV) 1989 Condition #3
11/2/88 Approval of Plans (ZA M804-PAD) Condition #3
8/3/90 Approval of Plans- Board of Referred Powers Action Condition #3 and #5
ZA 89-1129/BZA 4336-4337 1991 Conditions #1, #2, #3, #7, #8A, and #13
BZA 4484 (12/19/91 Written action) Condition #1 and #2

Response 54: This comment is noted. The history of BFI's alleged zoning violations and the related variance revocation proceedings was fully described in the *Additional CEQA Document* (April 1993), Section 2.4.2, City of Los Angeles Proceedings, pp. 2-6 and 2-7. The zoning proceedings were referenced within Appendix C of the same document. In summary, in 1988, the City Zoning Administrator found that some conditions of the City Landfill zoning variance had been violated, while also finding that allegations regarding other asserted violations were unfounded. The North Valley Coalition of Concerned Citizens (NVC) and BFI both filed appeals regarding the Zoning Administrator's decision.

When the City Landfill ceased operation in September 1991, the Zoning Administrator found that certain variance conditions were still enforceable, even though the landfill was inactive. BFI contested that decision and appealed that decision to the Board of Zoning Appeals (BZA). This appeal was heard by the BZA in November 1991. In its determination in December 1991, the BZA upheld the Zoning Administrator's decision to impose and enforce some of the conditions of the zoning variance.

BFI has never been found by the City to be in violation of the following zoning variance conditions that were placed on the City Landfill. In addition, the City never gave notice to BFI that any of these conditions were violated:

- Condition No. 6 (Possible relocation of entrance roadway) - The relocation of the entrance roadway into the landfill facility was not a condition of the zoning variance under which the City Landfill operated (when it was operational). The condition stated that certain specifications will apply if the entrance and entrance roadway are relocated as a result of building the sedimentation basin.
- Condition No. 7 (City Oak Tree Ordinance) - BFI was never found by the Zoning Administrator to be in violation of any of the regulations of the Oak Tree Ordinance, and the City never gave BFI notice or indication that this condition was violated.
- Condition No. 9 (Boundaries) - There have been no violations of this condition since its imposition in 1989. The City never gave BFI notice or indication that this condition was violated.
- Condition No. 13 (Aerial photograph) - This condition was not found by the Zoning Administrator to have been violated. This condition was imposed in 1991. An aerial photograph was ordered by BFI and was delivered to the City Zoning Administrator.
- Condition No. 14 (Operator inability to comply) - BFI is complying with this condition, and has been coordinating its compliance within its Closure and Postclosure Maintenance Plan, which is currently being processed by the City.
- Condition No. 2 (Condition of premises and parks and recreation) - Once the Closure and Postclosure period (at least 30 years) has expired, a letter would be sent to the City Parks and Recreation Department notifying them that the property would

be available. Since the landfill ceased operation the premises have been left in a neat and orderly manner.

- Condition No. 4 (Final contour plans) - Proposed final contour plans were submitted to the Zoning Administrator and as part of the Closure and Postclosure Maintenance Plan.
- Condition No. 5 (Water tanks and litter fence) - No onsite improvements are visible to the surrounding properties in the immediate vicinity. The request for approval to perform stream enhancement work was initiated by BFI and approved by the Zoning Administrator. This work was not a condition of the zoning variance under which the City Landfill operated. No work has been performed on this matter.
- Condition No. 8 (Survey) - The variance boundary survey will be accomplished during the closure approval process after additional survey monument requirements are identified by appropriate regulatory agencies.
- Condition No. 11 (Proposed sedimentation basin) - BFI had not violated this condition, since the building of the sedimentation basin is not a condition of the zoning variance. This condition states that “should the applicant proceed with construction of the sedimentation basin” certain specifications and regulations must be met. BFI has been working with the City to coordinate the installation of the sedimentation basin required for closure.
- Condition No. 12 (Removal of structures) - Facilities necessary for closure and postclosure purposes will remain onsite. BFI sent a map depicting these facilities to the City Zoning Administrator for approval in November. Approval of the Closure and Postclosure Maintenance Plan was delayed for numerous reasons, including the change in the City LEA, now the Department of Environmental Affairs, and lengthy litigation between the County and City. Those onsite facilities, which are deemed unnecessary by the City LEA, will be removed when the Closure and Postclosure Maintenance Plan is approved by the City and CIWMB.

Three conditions were found (in 1988) by the City to be violated during the zone revocation proceedings. These conditions included:

- Condition No. 1 (Vertical height of landfill operations)
- Condition No. 10 (Elevations) - In 1991, the Zoning Administrator found that BFI had failed to expressly seek approval to operate within less than 50 vertical feet of an existing ridge for this use. BFI believed that prior approval had been granted as part of a previous action, and the BZA found that there was no intention on the part of BFI to violate this condition.
- Condition No. 3 (Setback requirements) - The Bureau of Sanitation issued a violation (in 1990) for landfilling operations within the 600-foot setback area. However, the Zoning Administrator concluded that the violation was isolated “considering the landfill operator’s overall compliance with conditions and

regulations since July, 1989,” and that it “was inadvertent and minor, inasmuch as no actual detriment occurred to surrounding properties.” No further violation of this condition occurred, and the City never gave BFI notice or indication that this condition was violated.

BFI engaged with the City to comply with the following condition:

- Condition No. 15 (City inspections) - BFI has paid fees to the City LEA to satisfy this condition.

It should also be noted that the Zoning Administrator determined in September 1991 that certain conditions of ZA-17804(ZV) and ZA-89-1129(ZV) would remain in effect after September 21, 1991, which was the expiration date for the Sunshine Canyon Landfill to cease its landfilling operations. As noted by the Zoning Administrator, six conditions remained in effect and must be complied with by the project proponent. These six conditions included the following:

1. ZA-17804 - Condition No. 14:

“That at the expiration of this grant or the completion of the land reclamation operations, the premises shall be left in a neat and orderly manner with no uncovered material, debris or waste products left on the premises. Further, upon the completion of the project, the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes.

While laws subsequent to 1966 may affect the use of the site for recreational purposes, the condition can be fulfilled by the action required.”

Note: The project proponent submitted correspondence to both City and County recreation departments informing them that this condition would be complied with once closure and postclosure maintenance activities on the inactive landfill cease (a minimum 30-year period).

2. ZA-89-1129 - Condition No. 1:

- a. “The applicant shall prepare a survey of the boundaries and elevations of the approved variance, in conformity with Conditions No. 2 and 3 herein. Said survey shall be conducted by an independent surveyor mutually acceptable to the applicant and the Office of Zoning Administration, which latter shall act on consultation with the Office of Council District 12, the Bureau of Sanitation and the Bureau of Engineering. Until such survey is completed and certified to the satisfaction of the aforementioned parties, the Bureau of Sanitation shall continue to enforce the boundaries and elevations which have been so utilized since the City Council action of July, 1989.

- b. Said independent surveyor shall be selected by the applicant within two weeks of the effective date of the subject variance action.
- c. Said survey shall be provided to the aforementioned City parties for review within ten weeks following the effective date of the subject variance action.

This condition became effective on August 31, 1991. The ten week deadline for providing the survey (paragraph C) will obviously expire after September 21, 1991. The survey was needed to resolve the longstanding disputes over the proper location of the variance boundaries, and to clarify boundaries for any future entitlements sought within the Sunshine Canyon property.”

Note: This condition was satisfied by the project proponent with the submittal of closure and postclosure maintenance plans to the City LEA, CIWMB, and LARWQCB. Included within those plans is the engineered survey of the existing inactive landfill, its exact landfill footprint boundary and ancillary facilities.

3. ZA-89-1129 - Condition No. 7:

“Should the applicant proceed with construction of the sedimentation basin, said basin shall be constructed at a size which is adequate to the needs of the existing site, but which is not larger than necessary for the purpose of closure of the existing landfill. The construction shall be designed to meet minimum regulations and the determination of the final need and size shall be made by the Zoning Administrator in consultation with the appropriate regulatory agencies.

This condition will apply should the Bureau of Sanitation require the construction of a sedimentation basin within the variance area as a condition of closure.”

Note: This condition will be satisfied once the development of the sedimentation basin (for closure purposes) commences. Plans and specifications for this basin were submitted as part of the closure and postclosure maintenance plans to the City, CIWMB, and LARWQCB.

4. ZA-89-1129 - Condition No. 8:

- “a. Within six months after the landfill is full or after September 21, 1991, which ever occurs first, all landfill buildings, scales, checking stations, recycling center and facilities to accept trash shall be dismantled and removed from the site, except for offices and facilities necessary to monitor the closure plans.
- b. Prior to establishment or continuance of said facilities after September 21, 1991, a plan(s) shall be submitted to the Zoning Administrator along with evidence that said facilities are strictly for

the purpose of monitoring the closure plans for the City landfill portion of the site. The Zoning Administrator shall consult with the various regulatory agencies to verify that the facilities are for said purpose before authorizing the continuance or establishment of said facilities. Further, the Zoning Administrator may condition the authorization of said facilities.

It is noted that, during the life of ZA-17804, the variance area was not subject to the Oak Tree Ordinance (Ordinance No. 153,748) due to the express exemption under LAMC 46.02(a)2. However, after the expiration of the variance on September 21, 1991, future activities within the same area will be subject to the ordinance.”

Note: Closure and postclosure maintenance plans confirmed which facilities would remain onsite. Any existing facilities remaining onsite were authorized by the City.

5. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 1:

If the applicant cannot comply with the provisions of a condition of the variances due to a determination, requirement, etc. of a governmental agency, the applicant shall secure a written statement from the head of said agency explaining why the condition or provisions of the condition cannot be met and whether there is an alternative for meeting the condition or how the condition could be modified to enable the compliance intended.

Note: The project proponent has not had to obtain such a statement.

6. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 2:

The applicant shall pay for an inspector to be assigned by the City to monitor compliance with all the conditions of the variances which were not complied with prior to the expiration of the subject variance for the filling phase of the landfill project.

Note: The project proponent continues to pay a yearly fees to the City LEA to monitor the inactive landfill, even though this facility has ceased accepting waste. The City LEA agreed that as a result of the fees being paid, and the ability to monitor compliance at this facility, the project proponent has satisfy this condition.

Additionally, refer to Responses 91 and 92 within this document.

Comment 55: This Zoning change will leave the door wide open for B.F.I. to bring in almost my [sic] industrial application.

Response 55: As noted previously (see Response 11) the zoning on the subject site (M3) would be subject to numerous Q conditions (qualified classifications) that would likely limit activity within the zone to landfilling and ancillary uses. Furthermore, the landfill uses on the project site would be regulated by various city, State, and regional agencies under

the Mitigation Reporting and Monitoring Program (MRMP) adopted for the proposed project, which ensures that mitigation measures proposed in the Draft SEIR and adopted as conditions of project approval are adhered to by the project proponent (refer to Response 90 within this document). In addition, uses other than the proposed project would require review by the City Planning Department and public notification.

Comment 56: Mr. Funk an attorney representing B.F.I. said that even with the Zone change that B.F.I. would still give the land back to open space. What a joke. He knows as well as any person that this would not happen.

Response 56: A definitive postclosure use of the site has not yet been identified due to the mandated 30 years of postclosure maintenance. Postclosure uses at the site would be developed in accordance with the requirements of CCR, Title 27, §21190 and applicable City requirements.

Comment 57: I urge you to please look at B.F.I.'s record and do not grant them any approval for a zone change.

Response 57: This comment is noted.

Tom Murphy
Granada Hills, CA 91344

Comment 58: I recently attended the B.F.I. "Key Group Meeting" which was nothing more than a public relations "Dog and Pony Show" put on, I imagine, at the insistence of B.F.I.'s legal counsel.

Response 58: The Key Group Meeting is a requirement of the City Planning Commission and City Council for the requested amendment to the Granada Hills-Knollwood District Plan and zone change. The format of the meeting was approved by City Planning staff. Refer to Response 52 within this document for additional discussion.

Comment 59: That aside, I find it incredulous [sic] that B.F.I. is attempting to orchestrate a zone change to Heavy Industry so they can operate a huge dump in the City portion of Sunshine Canyon where such a dump obviously doesn't belong. This is a residential area. We have an elementary school, a little league ballpark, two public parks and a MWD "uncovered" water storage facility all of which will be damaged by the odor and pollution (seen and unseen) which will blow out of the dump during windy conditions. The wind blows a great deal and often rather strongly in this area because we are in the foothills. Believe me, we had a large amount of debris, odor and polluted dust blow out of the old, now closed, dump.

Response 59: As noted previously, the GPA/ZC application was filed as a result of City direction regarding the most appropriate entitlement process on the type of use being proposed. Refer to Response 51 for additional discussion about this issue.

Residential uses to the south would be separated from landfill operations by a ±100 acre open-space area. The impacts of the proposed project on schools and recreational facilities were analyzed in the Draft SEIR, Sections 4.14.3 and 4.14.4, respectively. The analysis contained within both these sections concluded that, based on distance and project operation features, impacts would be less than significant. The MWD's Joseph Jensen Filtration Plant is located approximately ½ mile southeast from the entrance to the project site. Based on intervening ridgelines and water quality testing procedures, the Jensen Filtration Plant would not be adversely affected by the proposed project. Refer also to Response 42. Dust control measures would be implemented as part of project operation as detailed in Response 98. The proposed project would implement a comprehensive odor control program. The features of this program are listed in Response 100.

Comment 60: The original zoning was correct. B.F.I. knew the zone restrictions when they purchased the land and I'm convinced they always intended to "Bully" their way into the heavy industry zone change so they could open their "Mega-Dump".

Response 60: Previous landfill operations in the City were permitted under a zone variance within an agricultural zone (1966 through 1991). See also Response 90 with respect to this issue. The current request for a GPA/ZC are being considered by the City as the most appropriate entitlement process for the proposed project. For additional discussion of this issue, refer to Responses 51 and 89 within this document

Comment 61: What are B.F.I.'s intentions when their dump is finally full in 26 short years? With the heavy industry zone will they decide to open a slaughter house or an aluminum plant and have another "Key Group Meeting" and inform whomever is left in the neighborhood what a wonderful thing they're doing for us?

Response 61: When the landfill is closed (after an estimated site life of 26 years), the project site will undergo a mandated 30 years of closure and postclosure maintenance. Uses on the site are limited during this time in compliance with CCR, Title 27, §21190. Postclosure uses would be developed in compliance with the Q conditions imposed during the zone change process and CCR, Title 27, §21190 and would be consistent with applicable City requirements.

Comment 62: I did ask one B.F.I. "official" what B.F.I. would do if they didn't get the zone change. He responded rather smartly that B.F.I. would simply go into the County portion. Why don't we give them that opportunity. I'm not in favor a a [sic] huge dump in the County portion either, but at least it is farther away from people who will be harmed by this dump.

Response 62: Under the Conditions of Project Approval granted for the operating County Landfill (Conditional Use Permit 86-312-(5), Condition 10[b]), "the permittee shall diligently pursue its application to the City of Los Angeles to expand the landfill within the City . . . to the highest level of appeal within the City's decision making hierarchy." If the City denies the applicant's request, then the landfill footprint within the County could be extended to the upper reaches of Sunshine Canyon. Refer to Response 67 for an additional discussion of this issue.

Comment 63: I truly believe the original zoning in this neighborhood was correct and put into effect to protect the people who live in this area. Please do not allow this environmental and human travesty to take place.

Response 63: This comment is noted.

Charlotte Rodrigues
Granada Hills, CA 91344

Comment 64: I am a resident adjacent to the proposed zone change requested for the Sunshine Canyon Landfill Project. I attended the informational meeting they held on November 18, 1997. I am writing to oppose the zoning change from Open Space to M-3 Heavy Industrial.

Response 64: This comment is noted.

Comment 65: Browning Ferris Industries owns property within Los Angeles County that is already zoned for the expansion of landfill activities and I feel that it is unnecessary to change the Open Space zoning to allow the landfill to come less than 2500 feet from our homes. I bought my property in June 1990 based on the knowledge that the landfill would soon be closing and moving further west into the county area. I feel that it is unfair to expect the residents to accept the Open Space zoning to be changed just so that BFI can made [sic] more money.

Response 65: This comment is noted. Refer to Responses 51, 89, and 110 for a discussion of why a GPA/ZC are being requested. Refer to Responses 7, 13, 18, 21, and 111 for a description of the ±100 acre open-space area and perimeter ridgelines that are located between the landfill footprint and residential uses to the south.

Comment 66: By the City's own definition, this property is zoned Open Space which is declared never to be developed. To drastically change from Open Space to Heavy Industrial is appalling. What justification does BFI have to request this? They are obviously only interested in the profit. This area was declared Open Space in an agreement with the City of Los Angeles when they operated their landfill from 1966 to 1991. Why is the City even considering allowing BFI to back out on it's [sic] prior obligation?

Response 66: See Response 65.

The commenter is incorrect in stating that the subject property was declared open space in an agreement with the City of Los Angeles. Refer to Response 90. Landfill operations occurred on the City portion of Sunshine Canyon from 1958 through 1991 (including 1966 through 1991 under a zone variance) with a general plan land use designation of "Minimum Residential." The redesignation of the project site within the City as "Open Space" occurred as part of revisions to the Granada Hills-Knollwood Community Plan. Approval of that plan occurred in July 1996. Refer to Response 89 within this document.

Comment 67: We all can understand the need for landfill sites, BFI has planned to continue landfill operations into the County area. They own additional land which is not being used in this

proposed 25 year plan. I feel they should utilize their additional property within the County area and save the area within the City as Open Space.

Response 67: The Sunshine Canyon Landfill Extension CUP, Conditions of Project Approval, Condition 10(b), directed the project proponent to file applications with the City to commence the environmental processing and permitting of a landfill within the City's jurisdiction as part of a combined County/City facility.³ The project proponent filed those project applications with the City on June 25, 1991. (Refer to Volume II, Appendix A2, of the Draft SEIR for a further discussion on this issue.)

When the Board of Supervisors approved the landfill project within the County, it stipulated under CUP Condition 10(b) that it "wished to conserve and if possible avert the destruction of oak trees and other significant ecological resources in its jurisdiction and encouraged the City to permit additional landfill capacity within its jurisdiction for its landfill capacity needs." With respect to that condition, if the City denied necessary entitlements for landfilling in the City, the Board of Supervisors would consider an extension of landfilling into higher elevations in the County area of Sunshine Canyon, providing for development of a 70-million-ton landfill encompassing ±542 acres. The apparent purpose of this CUP condition (by the Board) was to minimize the destruction of over 1,363 oak trees and biological resources in the upper reaches of Sunshine Canyon and to provide additional landfill disposal capacity within Sunshine Canyon and the City's jurisdiction.

Comment 68: We live in an area that is extremely windy. I am very concerned that they are proposing to alter the elevation of the Open Space area from the current 1450 feet to 2000 feet elevation. This would make the 192 acres almost the same elevation as the top of the ridge. I feel this will greatly change the wind patterns. Now the ridge acts as a wall to block the wind, with them filling up the area it would direct all of the wind over the ridge. Also of great concern is the odor that may occur and dust due to their operations.

Response 68: The proposed City/County Landfill Project would ultimately allow for a canyon-fill, cut-and-cover, 90-million-ton landfill in Sunshine Canyon. The maximum vertical height of the landfill footprint at buildout would result in a final fill elevation (at its top deck area only) of 2,000 feet mean sea level (MSL). The area at this height would consist of approximately 34 acres (within City jurisdiction); not the full 192 acres noted by the commenter. This top deck area would be contoured to blend into the surrounding natural terrain. At this elevation located near the City/County boundary, the proposed project would descend westerly (1,885 feet MSL) to encompass land within the County portion of Sunshine Canyon and connect vertically and horizontally with the approved County

^{3/} Refer to Sunshine Canyon Landfill Extension CUP and Oak Tree Permit 86-312-(5), Conditions of Project Approval, initially approved on February 19, 1991, by the County of Los Angeles Board of Supervisors. Specifically, CUP Condition 10(b) stated in part, "therefore, as soon as possible, but not later than July 1, 1991, the permittee shall apply to the City of Los Angeles to expand the landfill within the City . . ." At the time of the Board of Supervisors' final approval of the project in 1993, CUP Condition 10(b) was changed and stated in part, "therefore, the permittee shall diligently pursue its application to the City of Los Angeles to expand the landfill within the City . . ." These conditions are incorporated in Appendix C6 of the Draft SEIR.

Landfill footprint. The proposed landfill footprint would also descend (to 1,800 feet) southerly, to abut with the existing inactive landfill. (Refer to Figure 2.5-1 within the Draft SEIR.) Existing wind patterns would not be disrupted due to project development.

With respect to odors, the landfill must not be a source of odor nuisance per the requirements of CCR, Title 27, §20919. The project proponent would prepare and implement an odor abatement program, which would be approved by the designated City LEA. The program would ensure that odor levels within the facility are kept within baseline odor standards and that odors emanating from the facility would not exceed any odor detection thresholds at the property boundaries. Refer to Response 100.

The best method for ensuring that there will be no odor generation is by proper compaction and coverage of all solid waste materials by the end of the working day. Odors emanating from the generation of LFG inside the landfill will be controlled through the installation and operation of an LFG collection and flaring system (refer to Response 102) in full compliance with SCAQMD permitting conditions.

With respect to fugitive dust and in accordance with CCR, Title 27, §20800, and SCAQMD Rule 403, the proposed City/County Landfill would be operated and maintained to minimize the creation of fugitive dust conditions. The project proponent will take numerous measures to control fugitive dust emissions in and around the project site. The project proponent would ensure that the access roadway is maintained with a reasonably smooth surface designed to minimize the generation of dust and the tracking of material onto the adjacent paved public road (i.e., San Fernando Road). Several times during the day, the haul roads and excavation areas would be sprayed by water-tanker trucks to control fugitive dust emissions. Also see Response 98.

Comment 69: BFI owns additional significant amount of land in the County which I'm sure they would like to save for future expansion. I feel they should be denied the Zone Change and use their County property so as not to be adjacent to residents and negatively impact us.

Response 69: Refer to Responses 67 and 111 within this document for a discussion of the zone change. Several residential housing and light industrial projects have been developed proximate to the project site. These developments include several residential (single-family) housing tracts. All of these uses are located southward of the intervening ridgeline that ranges in elevation from 2,150 to 1,725 feet MSL.

Moreover, the land area being proposed for landfill development is disturbed due to extensive landfilling operations that have taken place in one form or another for a period of nearly 40 years.

With respect to any additional property (i.e., East Canyon) once owned by the project proponent. That property was dedicated to the County prior to the opening of the County Landfill. The project proponent has dedicated over 426 acres within East Canyon for open space and recreational purposes and is arranging for additional dedication of road and trail easement areas. The total dedication within East Canyon will encompass approximately 507 acres. This acreage has become part of the Santa Clarita Woodlands Park. Additionally, the project proponent is in the process of obtaining parcels (over 480

acres) located along the northerly and westerly boundaries of Upper Bee Canyon. That area will be used for wildlife preservation and recreational use and will become part of the Santa Clarita Woodlands Park.

Comment 70: Please notify me of future public meetings, I am very interested in being informed concerning this project.

Response 70: Your name and address was included in the Key Group Meeting/Open House notification, and will be included in future mailings for this project.

Barbara A. Fine
Barbara A. Fine Consultants
Beverly Hills, CA 90210-2003

Comment 71: Landfill Alternatives Save Environmental Resources (LASER), which I represent, is an environmental organization based in Newhall but active throughout Los Angeles County. Together with other community groups, LASER has been coordinating its concerns about the proposed Sunshine Canyon Landfill expansion with the office staff of 12th District Councilmember Hal Bernson.

Response 71: This comment is noted.

Comment 72: The organization is appreciative of the short extension granted by the Department of City Planning for receipt of comments about the General Plan Amendment and Zone Change, so that they are now the same date, December 5, 1997, as receipt of comments on the Draft Subsequent Environmental Impact Report (SEIR 91-0377-ZC/GPA; State Clearinghouse Number 92041053). LASER's concerns are enumerated following a brief description of the project.

I. DESCRIPTION

Sunshine Canyon Landfill is a Class III landfill accepting non-hazardous solid waste. It straddles the City-County Line; currently it is permitted by the County for a capacity of 17 million tons. Although its watershed is usually Countywide, it has in the past accepted waste from outside Los Angeles County. It is operated by Browning-Ferris Industries of California, Inc., 14747 San Fernando Road, Sylmar, California 91342.

A previously operating landfill within the City portion stopped accepting waste when its permit expired in 1991. Negotiations with the Local Enforcement Agency over a Final Cover began sometime prior to that date and only now appear to be finalizing. This "Cover" will also serve as a partial liner for the proposed expansion within the City.

BFI is proposing to come back into some 194 acres of its City land to construct a 5,000 tons per day landfill which would connect with 42 acres in the County, allowing for an average intake of 6,000 tons per day. If permitted, the enlarged landfill would allow a daily intake of some 11,000 tons per day of waste, for a total net capacity of 90 million tons. The combined landfill configuration would occupy about 451 acres in both the City

and County. While BFI must receive separate approvals from the City and County, it is also seeking permission to combine landfill operations, using one working face, about 18 to 24 months after obtaining permits from the City.

The applicant estimates that the landfill should be operational for about 26 years, and that total grading would involve about 10,044,500 cubic yards of earth, all of which would be utilized on site. At first, earth for daily cover is intended to be stockpiled within the County, but later in project development would be relocated as necessary.

The closed portion of the existing City landfill would be used to house a wood and green waste recycling facility, a public drop-off area, a tree nursery and a gas flare station. Currently, two water tanks and a flare station serving the old landfill are located to its immediate south.

Generally, these areas are bordered by O'Melveny Park and a residential area of Granada Hills. There is a 100-acre "buffer zone" in the southeastern portion of the property adjacent to some of the residences, and which has a restrictive covenant limiting the use of the land to non-industrial uses, with the exception of oil drilling. A portion of the Cascades Oil Field is located there.

The site currently is designated as Agricultural; a Zone Variance allows for an access road from San Fernando Road into the County, which was part of a negotiated settlement agreement. All previous landfill operations in the City have operated under a Zone Variance.

Response 72: With respect to a comprehensive discussion of the project description, refer to the Draft SEIR, Section 2.0, Project Description, pp. 2-1 through 2-97. The commenter's characterization of the project description is noted; however, exceptions to the project description include at least the following: both the existing inactive landfill (within City jurisdiction) and operational Sunshine Canyon Landfill Extension (or County Landfill located within the County jurisdiction) are Class III nonhazardous landfills. Both of these landfills are located near the City/County boundary; neither of these landfill footprints straddle the boundary area.

The commenter states that, "negotiations with the LEA over a final cover began sometime prior to that date and only now appear to be finalizing. This cover will serve as a partial liner for the proposed expansion within the City." The project proponent has not been in negotiations with the LEA regarding a final cover. The project proponent has been processing its Final Closure/Postclosure Maintenance Plans since the late 1980s. In addition, the cover will serve as a partial liner for the proposed expansion within the City. Where the proposed City/County Landfill overlies the side slopes of the existing inactive landfill in the City (the proposed landfill footprint overlies side-slope area only and not top deck areas of the inactive landfill), a liner system that complies with the requirements of Subtitle D must be constructed prior to the placement of waste over portions of the inactive landfill. This liner system must be placed on top of the final cover, and this type of liner system is referred to as a waste-on-waste liner system. This system would have side-slope and base components, depending on the existing inactive landfill configuration. Because the existing deposited waste would experience large differential settlements,

waste-on-waste liner systems will be designed and constructed to accommodate settlement while maintaining the integrity of the liner's containment system, including both the barrier layers and the leachate collection and removal system (LCRS). Typical sections of waste-on-waste liner systems were shown in the Draft SEIR, Volume II, Appendix B5, Figures 5, 6, and 7.

The solid waste facilities permit (SWFP) for the existing inactive landfill is still valid even though this landfill ceased accepting waste in September 1991 due to the expiration of its zone variance (ZA 17804). This landfill will have its SWFP in place until its final closure and postclosure have been deemed completed by the CIWMB. The closure and postclosure period for this landfill is a minimum period of 30 years.

As stated in the Draft SEIR, Section 1.0, Summary, p. 1-1, a portion of the proposed City/County Landfill footprint is located on ±194 acres within the City portion of Sunshine Canyon. In order to facilitate the design of the City/County Landfill Project, an area of approximately 42 acres within the County portion of Sunshine Canyon would be developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the operational County Landfill.

As indicated in the Draft SEIR, Section 2.0, Project Description, p.2-39, only a small portion of the existing inactive landfill's top deck area would be used for development of a green waste/wood waste facility (approximately 3 acres).

The project site is not designated as Agricultural as the commenter noted; rather, the current land use designation is Open Space and a zone variance is not being requested by the project proponent, rather a zone change on the entire subject site. In addition, to the foregoing response, refer to the Draft SEIR, Section 2.0, Project Description for a comprehensive description of the proposed project.

Comment 73: **II. CONCERNS ABOUT PROPOSED ZONING ACTIONS**

A. PLANNING DEPARTMENT ZONING PROCEDURE NOT UNDERSTOOD BY PUBLIC

The Planning Commission is empowered to certify environmental documentation and approve or disapprove zone changes simultaneously. However, zone changes and general plan amendments are tracked separately by Department staff and public comments on them appear also to be on a different timetable from responses to environmental documents.

Response 73: In the case of the proposed City/County Landfill, a City Planning staff member has been assigned to coordinate the processing of the GPA/ZC application. This staff person will coordinate the efforts with the City's Environmental Review Section EIR Coordinator (who facilitates the processing of the SEIR) and other departments within the City. With respect to BFI's pending application for a GPA/ZC, once the application is deemed completed by the Planning Department, the application processing will begin with the Planning Commission's formal initiation of an amendment of the General Plan so that the amendment, along with the proposed zone change, can be studied and considered by the

Planning Department, the City's General Plan Advisory Board, the Planning Commission, the Mayor, the Planning and Land Use Management Committee (PLUM), and finally the City Council. The City's processing steps include essentially the following:

1. General Plan Advisory Board consideration of the proposed amendment, pursuant to Los Angeles Municipal Code (LAMC), §§11.5.4 and 22.178 of the Los Angeles Administrative Code;
2. a noticed public hearing conducted by a hearing examiner for the Planning Commission, pursuant to LAMC, §11.5.6B;
3. preparation of a staff report and recommendation to the Planning Commission pursuant to LAMC, §11.5.6B;
4. a publicly noticed visit to the site by the Planning Commission, followed by a public hearing conducted by the Planning Commission where it will make a recommendation on the GPA/ZC;
5. submittal of the general plan amendment, together with the Commission's report and recommendation to the Mayor for his review and recommendation, pursuant to LAMC, §11.5.6C;
6. submittal of the recommendations of the Commission and the Mayor to the City Council's PLUM Committee;
7. a public hearing held by the PLUM Committee and preparation of the Committee's report and recommendation; and
8. a public hearing held by the City Council, where the Council will adopt a resolution changing the City's General Plan and an ordinance changing the zone on the property, pursuant to LAMC, §11.5.6D.

The City Council can adopt the general plan amendment by majority vote if it is not contrary to the recommendations of either the Planning Commission or Mayor. However, a two-thirds vote is required for adoption if the amendment is contrary to the recommendations of either the Commission or Mayor, and a three-fourths vote is required if the action of the Council is contrary to the recommendations of both the Commission and the Mayor (LAMC §11.5.6F.)

Comment 74: At this time, despite efforts to have applicants hold "key group" meetings, this process has not been made clear to the public. As a result, comments on environmental documents often include concerns about zone changes. That there are different dates for receipt of responses also is not well understood.

Response 74: The Key Group Meeting/Open House location and format for the proposed project were approved by City Planning prior to the meeting date. The public was informed by the following notification methods: notice mailed to over 8,000 owners/residents in a 2-mile vicinity of the project site, notice posted onsite, and notice placed in two local

newspapers. In addition, several community groups were informed of the meeting by the project proponent. With respect to the Key Group Meeting/Open House, two sessions were held and included introductory comments (by the project proponent's counsel) about the requested GPA/ZC.

Because the Draft SEIR includes numerous topical sections that directly relate to either general plan or zoning issues, it is not unusual to expect comments on those topical issues. To avoid any confusion, the date for the receipt of comments relative to the Key Group Meeting was extended by the City to December 5, 1997, thereby matching the date for the acceptance of comments on the Draft SEIR.

Comment 75: The results are unsatisfactory, because the current public confusion means that concerns of many individuals and organizations who take the time to respond with written comments are being overlooked or else answered by consultants for the applicant with a formula-like refrain that the comments do not pertain to the issues analyzed in the environmental documents. Although the Department is supposed to turn over zoning or City Plan comments to the Hearing Examiner, this does not happen very often because they are hard to separate in the text from the responses to the environmental documents.

Response 75: With respect to the proposed project, all individuals and/or organizations that have taken the time to orally or verbally comment on either the Draft SEIR or the requested GPA/ZC will have their comments reviewed and responded to by City Planning staff. City staff, in addition to City decisionmakers (e.g., City Planning Commission, City Council, and Department of Environmental Affairs), will consider all comments received.

Information (in whole or in part) from commenters will be included in either the Draft SEIR or City Planning staff report with respect to the GPA/ZC. Moreover, the City is also required under its own adopted guidelines to subject any "draft" material(s) prepared by consultants to its own review and analysis. Copies of any "draft" material(s) received from such consultants are part of the environmental record on the proposed project. Additionally, City Planning Departments (Environmental Review Section, Zoning Administrator, and Community Planning) work closely with one another to ensure that all aspects of a proposed project are properly coordinated for review and comment by all affected State, regional, and local agencies.

Comment 76: The following recommendations for clarification on separate responses to zone changes and City-generated Plans would result in less frustration on the part of the public:

1. The notice mailed with the environmental documents must contain specific instructions to separate comments on zoning or Plan issues, together with the staff person who is to receive each set of comments.
2. Response timetables must be coordinated; if an extension for environmental document response is given, the zoning or Plan response time must also be extended.
3. Materials handed out by applicants at "key group" meetings must clearly indicate this bifurcated process.

4. Better efforts to separate out responses to zoning from environmental issues should be made by project consultants, as supervised by Department staff. Formula-type responses must indicate they have been forwarded to the Hearing Examiner, rather than the present non-response.

Response 76: This request is noted.

Comment 77: B. PROPOSED GENERAL PLAN AMENDMENT COULD HAVE BEEN REQUESTED DURING RECENT COMMUNITY PLAN REVISION PROCESS

The Granada Hills-Knollwood Community Plan was revised about a year or so ago. The applicant could have requested the change from Agricultural to Heavy Industrial at that time, because the environmental documents have been under Planning Department review for some time.

Response 77: Refer to Response 89 within this document.

Comment 78: C. PROPOSED ZONE CHANGE IS NOT APPROPRIATE FOR LOCATIONS ADJACENT TO PUBLIC PARKS AND SINGLE-FAMILY RESIDENTIAL AREAS

The operation of machinery and other heavy equipment associated with M-3 areas is planned for the southern portion of the applicant's land, adjacent to O'Melveny Park and close to single-family residential areas. If "garbage dumping" operations are only allowed in the M-3 zone, then it is an indication that such facilities should be located away from these sensitive areas -- a corroboration of LASER's position that landfills and people are essentially incompatible.

Response 78: Several residential housing and light industrial projects have been developed within Granada Hills proximate to the project site. These developments include several residential (single-family) housing tracts. All of these uses are located southward of the intervening ridgeline that ranges in elevation from 2,150 to 1,725 feet MSL. The proposed landfill footprint would be approximately 1,700 feet from the nearest residential home, which is located south of the project site. There is a ±100 acre open-space area, which provides a separation between the proposed uses (i.e., landfill and ancillary facilities) and existing residential areas within Granada Hills. This open-space area and intervening ridgeline will minimize any potential impacts on residential homes within the Granada Hills area. Potential project impacts on O'Melveny Park were analyzed in the Draft SEIR, Section 4.14.4, and determined not be significant.

It should be noted that the following industrial facilities are located in close proximity to residential areas within Granada Hills: MWD's Joseph Jensen Filtration Plant, DWP's Balboa Distribution Station DS 86, the Los Angeles Aqueduct Filtration Plant, the Los Angeles Reservoir; the Sylmar Converter Station, and Aliso Canyon, which is currently being used as an underground storage field for The Gas Company.

Comment 79: D. HEAVY INDUSTRIAL ZONES ALLOW HIGH-LEVEL NOISE USES

According to the City's Noise Element, which has not been revised since 1975, all residential areas have the lowest allowable minimum ambient noise levels:

50 decibels during daytime hours of 7:00 A.M. to 10:00 P.M., and 40 decibels during nighttime hours of 10:00 P.M. to 7:00 A.M. Heavy industrial zoning (M3) would allow up to 70 decibels minimum ambient noise level for 24 hours per day.

The City's Noise Ordinance states these minimum ambient noise levels are to be used only if measured ambient levels are less than those values. Presumably they are to be measured at the property line.

Response 79: We assume the commenter expresses concern whether a general plan amendment will allow a greater noise level at local receptor locations. This is not the case; the general plan amendment would not change the requirement for the project to restrict noise at local receptor sites. While local receptors are located within the City (these guidelines were outlined in the Draft SEIR, Section 4.5, Noise, pp. 4-205 and 4-206, and pp. 4-208 through 4-213), the project proponent would also be required to comply with County ordinances that are more stringent. As noted in the Los Angeles County Noise Ordinance, Section 12.08.390 (C):

"If the measurement location is on a boundary property between two different zones, the exterior noise level utilized in subsection B of this section to determine the exterior standard shall be the arithmetic mean of the exterior noise levels in subsection A of the subject zones. Except as provided for above in this subsection C, when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level as designated in subsection A shall be the daytime exterior noise level for the subject receptor property."

Note that the County ordinance restricts residential noise to 50 decibels on an A-weighted scale (dBA) from 7:00 a.m. to 10:00 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. While the analysis within the Draft SEIR (pp. 4-215 and 4-216) indicates that noise at the most proximate receptor locations would be as high as 54 dBA, the document also indicates that this value is based on line-of-sight. The intervening perimeter ridgeline and ± 100 acre open-space area would provide additional attenuation. Thus, receptor noise will not increase above allowable residential levels at proximate residential locations as a result of project implementation.

Comment 80: According to the Draft Subsequent Environmental Impact Report, Section 4 on Noise Impacts, all normally-used landfill equipment normally exceeds these levels at 50 feet. However, the proposed wood and green waste recycling area would presumably use a chipper, which would also exceed the minimum limits of the Noise Ordinance. LASER notes that such facilities are allowed in the A1 zone, according to Section 12.24.C.61 of the Los Angeles Municipal Code. However, in this instance, the facility is close to a municipal park and would be visible from some residences in Granada Hills.

Therefore, LASER requests that any Conditional Use Permit approved by the City for landfill expansion specifically exclude wood and green waste recycling operations within City limits.

Response 80: Due to the presence of intervening terrain and the distance from residential areas, the landfill facility will not be visible from any of the proximate residences. With regard to O'Melveny Park, the landfill would only be visible from the highest elevations within the park only during the final phases of landfiling operation.

We assume that the commenter is referring to the maximum noise ordinance limits of 75 dBA as measured at a distance of a 50-foot limit for heavy equipment. The City limitation only applies to equipment operated within 500 feet of a residential area. Because the proposed landfill footprint is 1,700 feet from the nearest receptor (one residential house located at the end of Timber Ridge), this limitation would not apply.

Moreover, noise emanating from a wood chipper would not exceed (or even approach) that produced by a jack hammer as documented by Bolt Beranek and Newman (USEPA 1971) at 88 dBA at 50 feet. Even based on this worst-case scenario of 88 dBA, with a minimum distance of approximately 2,000 feet to the nearest receptor, line-of-sight noise would not exceed 56 dBA. When the intervening perimeter ridgeline is considered, projected noise would be less than 50 dBA.

As stated in the Draft SEIR, Table 4.5-3, during noise measurement No. 3, the dominant noise was from a firewood chopping operation approximately 120 feet across the road, the elevated I-5 Freeway east of San Fernando Road, vehicles on the road, two helicopter overflights, and surveyors operating an air compressor proximate to the noise meter. This reading noted a value of 70.6 dBA. The firewood chopping operation at this location is not unlike the proposed chipping operation. If the entirety of the monitored noise were due to the wood chopping operation and this value were to be projected to a 2,000-foot distance, the resultant noise is calculated at 46.2 dBA based on line-of-sight. Again, the intervening perimeter ridgeline would further reduce this noise, and the proposed green waste recycling area will not produce a significant impact.

It should be noted that the project proponent is seeking a GPA/ZC, not a conditional use permit for the proposed project.

Comment 81: E. LASER OPPOSES THE PROPOSED GENERAL PLAN AMENDMENT AND ZONE CHANGE

For all the reasons listed above, LASER opposes the proposed General Plan Amendment and Zone Change. It would support the continuation of the Zone Variance procedure for a nonconforming use within the A-1 Zone, with the exclusion of the wood and green waste recycling area from the City portion of the landfill.

Response 81: This comment is noted. Refer to Responses 11, 12, 18, 26, 40, 89, 93, 102, and 109 within this document that discusses the issues of entitlements.

Comment 82: The Landfill Alternatives Save Environmental Resources organization wishes to incorporate all other statements of opposition to the proposed General Plan Amendment and Zone Change, that is from Agricultural, Zone A1-1-O to Heavy Industrial, Zone M3-1-O for the proposed landfill expansion. LASER also requests that the community be allowed to comment further on the zoning following the release of the Final Subsequent Environmental Impact Report, at the time of the Hearing Examiner's public hearing.

Response 82: The proposed general plan amendment is to change the existing land use designation of "Open Space" to a "Heavy Industrial" designation. The corresponding zone change is as noted by the commenter. The Draft SEIR has been available for public review and comment from July 25 through December 5, 1997, a total review period of 132 days. The responses to comments provided will become a component of the Final SEIR. The Final SEIR will be available for public review. The public will also have an opportunity to comment on the requested GPA/ZC at several public hearings. Refer to Response 73.

Comment 83: LASER appreciates this opportunity to comment.

Response 83: This comment is noted.

Esther Simmons
Granada Hills, CA 91344

Comment 84: I am writing in opposition to any zone change requested by Browning Ferris Industries for the purpose of expanding their landfill operations.

Changing the zoning in an area that has the designation of "open space" would significantly impact the area by opening it up to unforeseen heavy industrial burdens. It stands to reason that once a zoning change has occurred it is difficult to restrict heavy industries from developing in that area.

Response 84: This comment is noted. Refer to Responses 89 and 109 within this document regarding this issue.

Comment 85: The zone change will be detrimental to the health and safety of the residents in the area and the commuters who use Balboa Blvd., Balboa St., San Fernando Road, and the adjoining freeways as their commuter corridors to access the Valley below or Santa Clarita above. Traffic has increased significantly in the last five years. Add to that the truck traffic for Sunshine Canyon and it becomes dangerous. We have seen at least three traffic accidents on San Fernando Road at the entrance to the landfill. All involved a passenger vehicle and dump truck. It can only get worse. The landfill is currently taking in about 3000 tpd. They expect to take in 11,000 tpd perhaps even as much as 14,000 tpd if their proposal is approved. It is important that you look at current traffic data, projected data and not rely on data that may have been available as little as five years ago.

The project proponent recently sought an interim change authorization to the B permit, that authorization has been received from the City. It is anticipated that a signal at San Fernando Road and the landfill entrance will be installed by March 1998.

Response 85: Refer to Responses 34 and 96 with respect to traffic issues.

Comment 86: This area is already burdened with undesirable land uses. There is Sunshine Canyon Landfill, a dynamite storage facility, a juvenile detention facility, a chlorine storage facility, an electrical substation, high pressure oil and gas pipelines, one running East and West and the other North and South, a police department driver training facility, a golf course [sic] and industrial park under construction. All of these within a 1-2 mile radius of the proposed landfill expansion. The traffic again will be significantly accelerated.

Response 86: This comment is noted. Refer to Responses 34 and 96 with respect to traffic issues.

Comment 87: Browning Ferris Industries' conduct toward the environment and the local residents is arrogant, dismissive and disrespectful. They therefore do not take their responsibility toward the environment and the community seriously. Currently, they have a County Health Inspector daily at the site, an appointed Advisory Committee whose members monitor the site and a watchful eye from the community in general. Can they be trusted?

Response 87: This comment is noted. The County Landfill has very strict and enforceable CUP conditions, which adequately ensure compliance by the project applicant. Also, as mentioned by the commenter, when the County Landfill receives and processes waste, a County LEA monitor is located onsite for inspection and enforcement activities. The LEA has the authorization to cease landfill activities (at any time), if it determines that the health, safety, or welfare of the general public is being endangered. In addition, these CUP conditions of project approval are monitored by a multiagency Compliance Committee, a Citizens Advisory Committee (consisting of residents within the Granada Hills community), and numerous regulatory agencies to ensure long-term compliance.

Comment 88: They violated City Zoning Laws and refused to comply with certain conditions before they were closed down in 1991. They ignored the Zoning Administrators request for a health survey, that to date is still in limbo. Because of their past record and their lack of concern for the residents of the area and its environment, it is necessary to deny them the zoning change. To grant the change will only serve to indulge them without tight restrictions, rules and regulations that will control the operation of their landfill.

Thank you for your time and consideration of these concerns.

Response 88: The zoning variance history with respect to the existing inactive landfill in the City was discussed in detail in the FEIR, Additional CEQA Document (April 1993), Section 2.4.2, City of Los Angeles Proceedings, pp. 2-6 and 2-7 and Appendix C.

As referenced, John Parker, the City's Zoning Administrator, imposed Condition No. 7 in his order of September 1, 1988, which included:

“That within 60 days of the effective date [sic] of this determination, the operator shall initiate the following to evaluate the impacts, if any, upon health by the landfill operation: A systematic sampling and analysis of air and soils in the area west of the Golden State/San Diego Freeways, north of Rinaldi Street, east of Reseda Boulevard and to the City limits on the north.

The study design of such survey shall be submitted to the Los Angeles County Health Department for review and approval prior to implementation, in consultation with the Office of Zoning Administration and the Office of Council District 12. The results of the sampling and analysis shall be submitted to the same agencies and offices.”

The City Zoning Administrator also determined in September 1988 (in consideration of the possible revocation action of the zoning variance of the landfill) that the reason why a health study was required by the City was because information in the record pertaining to this issue was not adequate to prove or disprove adverse health affects. Specifically the City Zoning Administrator stated,

“Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contained no scientific or expert documentation relating to this.”

The commenter is not correct in stating that the referenced condition was not complied with as set forth. The project proponent submitted a proposal to the City Zoning Administrator for the study requested. Lengthy discussions with the City ensued regarding revisions to the proposal, and modifications to the proposal were submitted. The City did not act on that proposal.

Hal Bernson
Councilman, 12th District
City of Los Angeles
Los Angeles, CA 90012-4878

Comment 89: As Councilman of the 12th District, in which this proposed project lies, I have numerous concerns about its location, impact, history, and zoning.

The Community Plan was completed in 1991 with significant community involvement. Public meetings and hearings were conducted and considerable opportunities existed for the owners of the subject property to submit proposals for future use. None were submitted. After community review, City Planning staff review, and City Council review, the current Granada Hills-Knollwood Plan was approved by the City Council and Mayor with the designation of A-1. All surrounding properties carry a plan designation of “Open Space” or “A1”. To allow a Community Plan Amendment to M-3, it would not conform to the surrounding uses, nor the vision of the community, and city planning process just recently completed.

Response 89: According to City Planning staff information, in 1985, the City Council adopted a motion to initiate general plan amendments for the Granada Hills-Knollwood Community Plan. On May 5, 1993, a Notice of Preparation for the EIR for revisions to the Granada Hills-Knollwood Community Plan (including the plan amendment) was prepared and sent to the State Clearinghouse in the Office of Planning and Research and to other Responsible Agencies. On May 13, 1994, the City prepared and filed a Notice of Completion for the Draft EIR, which was circulated for public review and comment from May 13 to June 27,

1994. The FEIR was completed in November 1994 and made available to the public thereafter.

The Hearing Officer held a public hearing on the preliminary plan and DEIR on May 25, 1994. The General Plan Advisory Board, on July 20, 1994, discussed the preliminary plan and recommended approval of the project. Additionally, the City Planning Commission conducted a limited public hearing on December 8, 1994, and requested additional clarifications and modifications to the recommendation and findings, staff report, and General Plan text and map. A second public hearing was conducted by the City Planning Commission on January 26, 1995, on this project. After this public hearing, the City Planning Commission recommended that the Mayor approve and recommend that the City Council adopt the Community Plan text and map with associated zone changes amending the Granada Hills-Knollwood Community Plan and portions of the General Plan. The Granada Hills-Knollwood Community Plan revisions were adopted by City Council on July 10, 1996 and approved by the Mayor on July 16, 1996.

Throughout the above-described Community Plan Amendment process, BFI extensively participated and commented (e.g., comments on the Draft EIR and FEIR, correspondence to the Planning Commission, verbal testimony before the Hearing Officer and Planning Commission, and meetings with City Planning Staff-Valley District, Neighborhood Planning Division) on the proposed Community Plan land use designation and corresponding zoning designation for the property. This participation included:

June 11, 1993 Correspondence from Rob Katherman (consultant to BFI) to Frank Fielding, City of Los Angeles Neighborhood Planning Division - RE: Sunshine Canyon Landfill.

This letter presented a formal request by BFI to redesignate its property within the City portion of Sunshine Canyon to Heavy Industrial use as part of the City's process of amending the Granada Hills-Knollwood District Plan.

July 13, 1993 Correspondence from Dean Wise, District Manager of BFI to Frank Fielding, City of Los Angeles Neighborhood Planning Division - RE: Sunshine Canyon Landfill.

This letter requested that all property owned by BFI within the City portion of Sunshine Canyon be designated for Heavy Industrial use as part of the City's process of amending the Granada Hills-Knollwood District Plan.

September 30, 1993 A meeting held with City Planning Neighborhood Planning Valley Office staff to discuss the Granada Hills-Knollwood District Plan. Relevant issues included (1) an overview of the proposed project and revisions to the Granada Hills-Knollwood District Plan, (2) discussions of how BFI's request to City Planning for rezoning and changes to the present land use designation for the project site would affect the Plan, (3) incorporation of the proposed Sunshine

Canyon Landfill project as a viable alternative, (4) the Plan's inconsistency with adopted City and County Solid Waste Management Plans, and (5) the Plan's inconsistency with distinguishing between public facilities and open space land use designations.

May 25, 1994

Letter from Linda J. Bozung, Atty. (counsel to BFI) to Con Howe, Director of Planning for the City of Los Angeles - RE: Granada Hills-Knollwood Community Plan - CPC No 23571 GPA; CF 85-1234; EIR No. 94041027. This letter was also presented as public testimony and described below.

May 25, 1994

Testimony presented by Linda J. Bozung, Atty., at the Granada Hills-Knollwood Community Plan public hearing requesting that the Sunshine Canyon Landfill site be amended to a "Heavy Industrial" general plan designation. Ms. Bozung stated that Planning staff's preliminary recommendation to "Open Space" was inconsistent with the use of the property for the next 30 years. Also, the Draft EIR ignored that the landfill is an industrial use. Los Angeles County had approved the landfill adjacent to the City; however, the Draft EIR incorrectly identified the area as undeveloped. BFI planned to submit a zone change and general plan amendment to the City to use the property within the City boundary for heavy industrial use.

Ms. Bozung also stated that the proposed Granada Hills-Knollwood Community Plan procedures violate CEQA, with reference to their actions regarding the project site (owned by BFI). The Draft EIR for the Community Plan did not examine the existing use of the site, the use that is approved, and the proposed use.

June 27, 1994

Letter from E. William Hutton, Regional Counsel, BFI to Los Angeles City Planning Department - RE: Comments on the City of Los Angeles Granada Hills-Knollwood District Plan Revision Draft EIR (April 1994).

This letter responded to the City's Granada Hills-Knollwood District Plan Revision Draft EIR. This letter addressed several key issues and specifically addressed the objection to the redesignation of BFI's project site to an open space land use designation.

December 8, 1994

Letter from John C. Funk, Esq. (counsel to BFI) to the Honorable City Planning Commission - RE: Granada Hills-Knollwood Community Plan Revision; City Plan Case No. 94-0356 CPR (ZC); December 8 Agenda Item No. 9.

This letter indicated that the proposed Plan, the Plan EIR, and the related staff report do not provide either adequate factual information or sufficient planning justification for this proposed change in land use for Sunshine Canyon. The letter provided information discussing the unique circumstances of BFI's property that warrant retaining the current land use designation for landfill-related activities currently occurring on the subject property, landfill closure and postclosure activities mandated to occur on the property in the future, previous City actions and planning decisions regarding the property, County approval of a landfill on the abutting property owned by BFI in the County portion of Sunshine Canyon, and a pending application for City approval of a GPA/ZC for future landfilling on the subject property.

December 8, 1994

Testimony by John C. Funk, Esq. before the Planning Commission regarding the Sunshine Canyon Landfill project site and the proposed revision to the Granada Hills-Knollwood Community Plan.

January 12, 1995

Memorandum from John C. Funk, Esq., to R. Nicholas Brown, and Madhu Kumar, City of Los Angeles - RE: Post-Closure Restrictions on Landfill Property Land Uses.

The purpose of this memorandum was to respond to the City staff's request to provide additional support for the positions expressed in Mr. Funk's December 8, 1994, letter, which opposed an "Open Space" designation for Sunshine Canyon, and that during the closure/postclosure period of a landfill, most land uses other than landfill-related activities would be prohibited.

The memorandum summarized the basic State and federal statutes and regulations that control the closure and postclosure activities on landfill property, as well as the administrative restrictions and liabilities typically imposed upon the property owner relative to closure and postclosure requirements.

June 24, 1995

Letter from John C. Funk, Esq., to George Lefcoe, President of the City Planning Commission - RE: General Plan Framework Element.

The purpose of this letter was to request the commission to correct several of the Framework Element EIR maps, which contained designations that were inconsistent and incorrect regarding the Sunshine Canyon Landfill area.

As a result of the above correspondence and discussions with City Planning staff, a footnote was added to the Granada Hills-Knollwood Community Plan Land Use map that referenced the historical operation of the Sunshine Canyon Landfill and its pending

closure. However, the mandated 30-year closure and postclosure maintenance of the inactive City landfill or the operating County Landfill adjacent to proposed project were not referenced. Both of these uses were not compatible or consistent with an Open Space land use designation.

With respect to the application for a GPA/ZC on the subject site, BFI's counsel (Linda Bozung, Atty.) met with the Zoning Administrator (Robert Janovici) in May 1991 to discuss this specific issue. It was confirmed by Mr. Janovici that project entitlements on the subject site would necessitate a GPA/ZC.

Additionally, in December 1990, John Parker, Associate Zoning Administrator, stated the following opinion on this matter:

"In the opinion of the Administrator, no future entitlements with respect to Sunshine Canyon Landfill should be considered under a zone variance process. The findings for a zone variance do not speak to the merits of the project, but more directly to hardships, special circumstances and property rights, which are arguably not the most appropriate findings for this type of case." Mr Parker noted further that a more appropriate avenue "... for seeking discretionary entitlements would be a change of both the zone and General Plan designation of the property (e.g., to the (Q) M3 Zone limited solely to landfill uses, and to a community plan designation with a landfill symbol and/or heavy industry land use ...)"

In addition, Mr. Parker indicated that "The benefit of ... zone change/plan amendment ... is that solid waste disposal is clearly a regional issue invested with a public interest, which deserves both a large arena of discussion and a coherent policy voice. A zone change/plan amendment would go to both the City Planning Commission and City Council; ... On the other hand, a use variance goes to a Zoning Administrator and on appeal to the Board of Zoning Appeals (from which an appeal to the City Council would occur only if the BZA approves the variance in some form). Cases of this caliber should not have the potential for going to disparate bodies which may perceive merit in different ways (and arguably must, since the variance finding address merit far less than do ... or zone change findings)." (Source: City of Los Angeles Correspondence RE: Case No. ZA 89-1129(ZV), December 31, 1990)."

Under the City's Planning and Zoning Code, § 12.20.37(I), the M3 zone permits landfilling uses. As further defined under that section, "None of those uses which may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise, vibration and the like ... shall be located nearer than 500 feet to a more restricted zone." In this regard, landfill operations would not be located within 500 feet of the more restrictive zoning designation of A1. The proposed landfill footprint would be approximately 1,700 feet from the nearest residential unit (located south of the project site). In addition, the ±100 acre open-space area provides open space between the proposed uses (i.e., landfill and ancillary facilities) and the residential areas within Granada Hills. Approval of the requested zone change to M3 and corresponding Community Plan designation of Heavy Industrial would remedy existing zoning and land

use designation inconsistencies between the existing A1 and Open Space designations, remedy the inactive landfill's closure and postclosure maintenance requirements, and permit development of the proposed project. Within the immediate area, north of the I-5 freeway and San Fernando Road, an M1 zone is located next to an A1 zone.

Comment 90: The previous use of the property was allowed under a Zone Variance which existed for over 30 years. A continued use of this property should only be allowed under the same procedure which will allow the City to continue to monitor such a use with significant community impact.

Response 90: Landfill operations within the City portion of Sunshine Canyon commenced in March 1958 (under ZA Case No. 14544, which covered 1966 through 1991) and ceased in September 1991 (under ZA Case No. 17804). Refer to Responses 51 and 110 for a discussion of why a zone variance is not being requested. As part of certification of the FEIR prepared for the proposed project, a MRMP has been adopted. The City, as the designated Lead Agency, will be responsible for the monitoring, performance, and effectiveness of the mitigation measures presented in the FEIR and incorporated as conditions of project approval. City agencies/staff that would monitor/enforce the proposed project's compliance with these conditions include the Department of Environmental Affairs, the Planning Department, Building and Safety Department, BOE, DPW, DWP, LAFD, City Forester, and DOT. Landfill operations would also be monitored/enforced by the LARWQCB, the CIWMB, the SCAQMD, U.S. Fish and Wildlife Service, Corps, and California Department of Fish and Game (CDFG). Refer also to Response 11, 40, and 89 for a discussion of the zone variance.

Comment 91: Previous history. The current applicants, BFI owned and operated a landfill on this site between 1987 and 1991. During that time numerous violations of regulations occurred concerning the operations of the landfill and the city zoning laws. A revocation hearing process was initiated in 1988 and the result was that the City Planning Department found that BFI had violated City Zoning Laws. A unique "Curative Variance" was required to bring the landfill into conformance with permitted operations. During case # ZA 17804 (RV), City Zoning Administrator John Parker concluded "In the context of the strong winds which blow from the north, **this landfill is probably in a poor location**" and that "several of the violations **go well beyond being inadvertent infractions**" (Emphasis added).

Response 91: On March 14, 1988, the Office of Zoning Administrator conducted a public hearing to solicit testimony and gather information to consider the revocation or modification of the Sunshine Canyon Landfill zone variance. The revocation action was requested by Councilman Hal Bernson, citing allegations of various violations of the variance grant and additional nuisances. The Chief Zoning Administrator instructed that proceedings be initiated under §12.27-B, 5 of the LAMC and Condition No. 13 of the extant grant to determine the validity for cause to revoke or modify the operation.

Based on decisions reached by John Parker, City Zoning Administrator, in September 1988, the City Board of Zoning Appeals in December 1988, and the City Council in July 1989, the City determined that certain conditions of the zoning variance previously approved by the City had been violated by BFI, imposed certain conditions regarding the

continued operations of the landfill in the City, and ordered that BFI take certain curative actions, such as filing an application for a modification to the zoning variance.

Mr. Parker, the Board of Zoning Appeals, and the City Council also determined that a number of complaints raised in these proceedings were not factually supported. (See below for greater detail.) For example, these agencies determined that allegations regarding adverse health impacts, water contamination, and improper acceptance of toxic waste were factually unproven. (Refer to Appendix C of the September 1988 Decision, pp. 61 through 62). Also, the zoning violations found by the City did not cause the City to revoke BFI's zoning variance. Copies of Mr. Parker's, the Board of Appeals', and the City Council's respective decisions, which include lengthy recitations of the participants' respective positions, were attached as Appendix C within the September 1988 Decision by the Zoning Administrator.

With respect to the conditions of the zoning variance that the City concluded had been violated, those specific conditions pertained to rubbish and street litter, dust, and landfilling activities beyond certain boundary and height limitations of the perimeter ridgeline. The Zoning Administrator stated that high winds sometimes prevail in this area of Sunshine Canyon and that rubbish blowing from the landfill was related to those conditions, but that this problem was not a major problem (this statement is referenced in Appendix C of the September 1988 Zoning Administrator's Decision, p. 60). The Zoning Administrator also concluded that street litter was an issue that had been satisfactorily resolved by the project proponent (see Decision, p. 62). As more fully discussed in Section 2.4.3.3, p. 2-9, of the FEIR, Additional CEQA Document, representatives of various regulatory agencies testified that BFI implemented protection measures that adequately addressed these past problems. As discussed in Section 2.4.4, p. 2-12, of that document, all of these measures were imposed for the operational landfill in the County, along with additional stringent requirements.

Similarly, with respect to the issue relating to dust, the project proponent took curative actions after the City's determination in the zoning proceeding, which included the adoption of a refined surface soil treatment and transport abatement plan. Representatives of various regulatory agencies testified that these control measures proved successful. These measures are currently being used for the operational landfill in the County, in addition to other mitigation measures relating to dust control.

Finally, there was a dispute with respect to landfilling activity beyond certain height and boundary limitations contained in the zoning variance. A number of persons who analyzed this issue expressed the belief that the proper assessment of those limitations was difficult. For example, Mr. Robert Packard, the Engineer of Survey for the City's Bureau of Sanitation, expressed such an opinion as to the boundary limitations. However, the Zoning Administrator found violations. The project proponent stated that it took action, such as applying for a grading permit to cure an aspect of the issue involving boundary limitations. That curative action was approved by the City in October 1989.

It should also be noted that Mr. Parker, Associate Zoning Administrator, stated the following information with respect to specific allegations:

“Dust, as well as rubbish blowing from the landfill, constitute violations of Condition No. 13. BFI is presently making good efforts to control dust, but additional measures are needed. In the context of the strong winds which blow from the north, this landfill is probably in a poor location. **However, this is a hindsight observation, after residential development has crept northerly to the edge of the landfill property** [emphasis added]. Under the present circumstances, further efforts to control dust and trash must be made. Fugitive dust appears to relate more to the condition of the surface of the site than to active filling operations. This action attempts to address that aspect.”⁴

“BFI must be granted the opportunity to cure the violations and problems relating to the landfill. Although several of the violations go well beyond being inadvertent infractions, **the landfill is an enormously complex and extensive operation involving inevitably some infractions** [emphasis added]. This action constitutes the first time that the Office of Zoning Administration has officially found the landfill to be in violation of conditions; as would occur in a revocation action under a conditional use, the operator must be given an opportunity to prove up and, only in the event of future violations and failures to comply, would actual revocation be considered under a further public hearing and action.”⁵

Refer to Response 89 for an additional discussion of this issue.

Comment 92: In light of the poor operating record of BFI and their lack of concern for the local residents, stringent operating regulations and re-examinations are necessary to insure public safety. A plan amendment and zone change would effectively eliminate those necessary reviews and monitoring by appropriate city agencies. A Zone Variance is the only way to protect the community from a bad operator, and BFI’s history on this same site dictates constant monitoring by City Planning.

Response 92: After looking at the information in the City record, County Planning staff did not believe that they posed a significant threat to the enforceability of strict mitigation measures and operating conditions that were imposed for the now operational County Landfill. In developing these strict control measures, the County recognized that operation of a landfill can be complex and that unanticipated problems can arise regardless of the quality of the landfill operator’s management. Therefore, the County developed very comprehensive and strict mitigation measures and operating conditions for the County Landfill that are now successfully enforced. Since the County Landfill has been operational, no operational violations that have been reported by regulatory agencies.

^{4/} Case No. ZA 17804 (RV) Sunshine Canyon Landfill Consideration of Revocation - Zone Variance, September 1, 1988, Summary of Conclusions and Findings, No. 7.

^{5/} Case No. ZA 17804 (RV) Sunshine Canyon Landfill Consideration of Revocation - Zone Variance, September 1, 1988, Summary of Conclusions and Findings, No. 6.

The implementation of a GPA/ZC does not take away compliance with conditions of project approval, mitigation measures and monitoring programs, or permitting obligations. Numerous regulatory agencies will have responsibility for the continuous monitoring of the proposed project. Refer to Response 90.

Comment 93: The establishment of any use in the A-1 zone would be a bad precedent to start. It would promote the argument that the zone has been established, and the A-1 area is no longer the preferred use.

Response 93: The existing A-1 zoning designation does not reflect the past or current use of the project site within the City, which includes an inactive landfill that is in the process of closure. The general project site also includes the operating County Landfill. In accordance with the existing land use designation of Open Space, the following uses would be permitted to be developed (by right) under the corresponding "A1" zone (i.e., agricultural zone) subsequent to environmental review by the City: one-family dwellings, community parks, golf courses, and extensive agricultural uses. Development of these uses would not be pursued by the project proponent in the foreseeable future because of the existing inactive landfill facility in the City, which is mandated to undergo closure and postclosure activities. This would involve placement of final cover and vegetation and installation and monitoring of environmental protection and control systems. Because operations at the County Landfill and inactive landfill are industrial in nature, they have the potential to create impacts on public health, safety, and the environment. Allowing public access to private property for active or passive recreational activities, such as hiking, biking, or equestrian uses, during these operations may result in unnecessary liabilities to the project proponent and the City, and potentially interfere with the maintenance of postclosure systems at the existing inactive landfill.

These uses (e.g., residential, park, golf course, agriculture) would not be considered feasible by the project proponent until the mandated 30-year minimum closure and postclosure period for the existing inactive landfill is deemed "complete" by the CIWMB. In this regard, the project proponent is required under State law to comply with mandatory closure/postclosure and maintenance requirements that are enforced by the City LEA and the CIWMB for this existing inactive landfill facility.

It should also be noted that the now inactive landfill was in operation for over 30 years under variances from the underlying agricultural A1-1 zone. Although the property is zoned for agricultural use, it was noted in 1965, when Variance 17804 was granted, that the area was not suitable for agriculture. Roy Bundick, City Planning Associate, indicated in the findings of his staff report for Variance 17804, dated October 27, 1965, that "the site is so located and has such topography that its use for permitted uses (agriculture) is impractical." The land would be even less suitable for agricultural uses now than it was when the original variance was issued due to past landfill operations and the adjacent operating County Landfill.

To eliminate inconsistencies between existing and foreseeable uses on and around the project site with the current zoning designation, and to permit the development of the project, the project proponent has requested a GPA/ZC. Several industrial uses already exist in the vicinity including the MWD Joseph Jensen Filtration Plant, the DWP Balboa

Distribution station, and warehouses. In addition, a ±100 acre open-space area and perimeter ridgeline are located between the proposed landfill footprint and residential uses to the south.

Comment 94: The original zone variance of 1956 conceptually called for an open space/recreation use for this area. The current closure plan keeps open the possibility of a park or recreation use in 30 years. To allow a permanent zone change to M-2 [sic] forever closes that opportunity.

Response 94: Any future development of the project site would be consistent with the City's General Plan elements and zoning requirements and conform to the requirements of CCR, Title 27, §21190. As part of the conditions required for the operating County Landfill, over 426 acres have been dedicated for recreation purposes within East Canyon

It should be noted that the zone change to M3 would not preclude the opportunity of future open space and recreational use on the project site. It should be noted that a landfill operation of 45 acres was originally granted on the subject property under ZA Case No. 14544 in March 1958, for a 10-year period. Extant Case No. ZA Case No. 17804, granted in April 1966 superseded the earlier case for an expanded 300-acre site operation. Fifteen conditions of approval were attached to the 1966 variance. ZA Case No. 17804, Condition No. 14 (granted in April 1966) states the following:

“That at the expiration of this grant or the completion of the land reclamation operations, the premises shall be left in a neat and orderly manner with no uncovered material, debris or waste products left on the premises. Further, upon the completion of the project, the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes.”

The existing inactive landfill, located within the project site, is currently in the process of closure. A closure and postclosure maintenance plan (pursuant to CCR, Title 27, Division 2, Chapter 4, Subchapter 4 (Development of Closure/Postclosure Maintenance Plans) and corresponding environmental documentation (i.e., Initial Study and Mitigated Negative Declaration) were submitted to regulatory agencies (i.e., CIWMB, LARWQCB) for review and comment. The final plan is pending before the City LEA. Postclosure uses at the site would be developed in accordance with the requirements of CCR, Title 27, §21190. As required under CCR, Title 27, §21180, the project site would undergo a 30-year minimum closure and postclosure maintenance period. .

Comment 95: A buffer zone around the landfill was established in the zone variance of 1956, and the later zone revocation hearing of 1989, to protect the area from negative impacts of the landfill. This zone change will allow previously unwanted uses of this buffer zone and will give BFI additional property rights that were not envisioned by the City in its previous actions.

Response 95: Located directly to the south of the existing inactive landfill is a ±100 acre open-space area, which was established by the project proponent (not by variance) to separate that landfill from residential areas in Granada Hills. This open-space area was permanently

set aside in the early 1980s by the project proponent and serves as an onsite mitigation area. This area also supports various uses (i.e., leased oil wells or associated facilities).⁶ Within the area, a voluntary tree-planting program was established by the project proponent, and a diverse variety of native and nonnative trees were planted. Currently, over 11,000 trees have been planted, including 1,367 coast live oak trees.

This open-space area is not being planned for landfilling and cannot be developed with any new heavy-industrial uses, even with rezoning of the subject property to an M3 zone. Furthermore, no landfilling will occur in this area. Furthermore, this area is proposed for future mitigation planting if the development of the proposed project occurs.

Comment 96: Traffic is already severely impacted. Additional traffic created by a zone change which allows greater use creates a dangerous situation. It is estimated that this zone change will bring all the nearby intersections to level F. Additional traffic on this site cannot be mitigated.

Response 96: The Draft SEIR, Section 4.13, Transportation and Circulation, examined 13 key intersections and the landfill entrance within the study area. The majority of the intersections in the study area are currently stop (sign) controlled. Existing a.m. and p.m. peak-hour operating conditions for the 13 key intersections were investigated according to the critical movement analysis (CMA) methodology as required by LADOT. As indicated in the Draft SEIR, 12 of the 13 key intersections currently operate at level of service (LOS) "D" or better during the a.m. and/or p.m. peak hour. As stated in the Draft SEIR, Roxford Street at the I-5 Freeway (southbound onramp) operated at LOS "F" during the a.m. peak hour, and San Fernando Road at Balboa Boulevard operates at LOS "E" during the p.m. peak hour.

It is not anticipated that additional traffic created by a zone change would create a "dangerous" situation; rather, with the implementation of mitigation measures, acceptable service levels are anticipated to occur during both the a.m. and p.m. peak hours at all 13 intersections. This information is presented within Section 4.13 Transportation and Circulation, of the Draft SEIR. Mitigation measures include the following:

- Roxford Street at the I-5 Freeway (SB ramp): Restripe SB approach on Roxford Street to provide dual left-turn lanes and one through lane.
- Roxford Street at the Encinitas/I-5 Freeway (NB ramp): Restripe WB through lane on Encinitas Avenue to left/through option lane.
- San Fernando Road at Balboa Boulevard: This key intersection features two through lanes in each direction on San Fernando Road and two NB approach lanes, striped as an exclusive left-turn lane and an option left-right turn lane, provided on Balboa connector. A separate WB left-turn lane as well as protected left-turn phasing is provided. Existing pavement widths and physical constraints (i.e.,

^{6/} *Final Environmental Impact Report Mitigation Monitoring Summary*, Part VI (A) (B), Ultrasystems Environmental Incorporated, and CUP and Oak Tree Permit 86-312-(5), Condition No. #44. November 30, 1993.

hillside encroachment) do not allow for any physical improvements, such as providing an exclusive EB right-turn lane on San Fernando Road for heavy existing and anticipated right-turn volumes. Given the lack of available physical improvements, it is recommended that automatic traffic surveillance and control signal equipment be installed at this intersection. LADOT believes that the overall capacity of an intersection increases 7 percent by allowing a computer signal control system to improve the efficiency of operations. Preliminary discussions with LADOT staff indicate that this is a possible mitigation measure that could be implemented to offset the impact of Sunshine Canyon Landfill Project traffic.

- San Fernando Road at Sierra Highway: Restripe NB through lane on San Fernando Road to through/right option lane.
- San Fernando Road at project driveway: Restripe San Fernando Road to provide a second NB left-turn lane. The installation of automatic traffic surveillance and control signal equipment is recommended at this intersection.

With the implementation of mitigation measures, no significant impacts are anticipated as a result of project development.

Comment 97: In closing, the change of Zone and Community Plan is unwarranted considering the past history of this site. The very recent Plan clearly specifies the appropriate use of this land when considered with surrounding properties. Any change of use must be done through a Zone Variance process which will allow the City more latitude in providing protection for the surrounding community. I remain unalterably opposed to the re-opening of this landfill and the proposed Zone change can only facilitate that unwanted incursion into this neighborhood.

Response 97: This comment is noted. Refer to Responses 51, 89, and 110 for additional information on why a GPA/ZC are being requested. Refer to Response 90 for a description of the local, State, and regional agencies that will monitor and enforce operating conditions of the proposed project.

2.4 Verbal Comments Received During the Key Group Meeting/Open House (November 18, 1997) at the Working Stations

2.4.1 Comments Received at the Landfill Operation Station

Comment 98: What safeguards will be in place when high winds are blowing, to ensure that dust will not blow onto homes in the Granada Hills community? How will the landfill operate to prevent this condition from occurring, especially when the landfill reaches its highest elevations (e.g., 2,000 feet mean sea level [MSL])? Will the landfill shut down during high wind events, especially once landfill operations reach higher elevations?

Response 98: Numerous mitigation measures described in the Draft SEIR (pp. 4-86, 4-88, and 4-90) for construction and operation of landfill cells and roads would be implemented to ensure

that fugitive dust will not migrate into residential areas located near the project site. Some of those mitigation measures include the following:

- Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances.
- Graded areas shall be watered as necessary to reduce dust emissions.
- Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.
- To minimize fugitive dust emissions, the access roadways shall be paved and haul roads to the working face areas shall be hard packed.
- At least twice-daily watering or wet sweeping shall be done to remove windblown surface dust. AP-42 assigns a control efficiency of 50 percent for twice-weekly cleaning of industrial paved roads. With twice-daily cleaning, a control efficiency in excess of 95 percent is predicted.
- An SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency of 80 percent shall be applied and subsequent watering shall be performed.
- Operations shall be restricted to encompass no more than a 10-acre active working face area.
- To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.
- Subject to approval by the CIWMB, filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.
- An SCAQMD-approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.

With respect to residential location and development of the proposed landfill footprint near residential locations, the following information is provided. Surrounding properties are generally located downwind of both the existing inactive and operational County Landfill and at elevations well below the project site's ridgelines. Existing perimeter ridgelines surrounding the project site range in elevation from $\pm 2,150$ feet MSL to the

southwest and $\pm 1,950$ feet MSL near the western perimeter of the ± 100 acre open-space area.

Elevations within the project site would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills. The highest proposed final fill elevation of the proposed City/County Landfill footprint is 2,000 feet MSL. It is not anticipated that fugitive dust from landfill operations, even during its final stage of development, would migrate into residential areas. Specifically, the active working face areas will encompass no more than 10 acres. In addition, the ± 100 acre open-space area located on the southern boundary of the project site will continue to be maintained and enhanced with both native and nonnative vegetation. Already more than 10,900 trees and shrubs have been planted in this area, including over 1,367 coast live oak trees. Many of these trees now exceed 15 feet in height.

Comment 99: What can the community do if BFI begins to operate the landfill improperly, the way they did in the late 1980's?

Response 99: A sign is posted at the landfill entrance with the telephone number of the District Manager and the onsite caretaker of the landfill. These individuals can be contacted directly with any concerns that individuals may have regarding the operation or maintenance of the landfill.

Additionally, with respect to the operational County Landfill, the County LEA has the authority to order the immediate cessation of landfilling or other activities at the site if it determines that the health, safety, and/or welfare of inhabitants of the County so requires. Any cessation would continue until such time as the County LEA determines that the conditions leading to the cessation have been eliminated or reduced to an acceptable level. The LEA for the City is the Department of Environmental Affairs, which may be contacted. The other regulatory agency that may be contacted is the SCAQMD, which operates a hotline number (800/521-6301).

Comment 100: What happens when residents in Granada Hills start to smell odors?

Response 100: As stated in Response 99, the District Manager and the onsite caretaker can be contacted directly with any concerns regarding odors. In addition, the SCAQMD will respond to calls on odors matters. This agency maintains an 800 number for such concerns.

With respect to odors, refuse received at the proposed landfill would be placed within one hour of receipt, compacted, and covered with a minimum layer of 6 inches (i.e., State standard) of cover material daily; therefore, the potential for odors is substantially reduced. The odors that may be released directly from the refuse prior to being covered with cover material are usually at low levels and are dispersed in the atmosphere at levels of concentration below which they do not create a nuisance to local receptors. The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain, so that no odor nuisance from refuse emplacement should occur.

The following mitigation measures would be implemented as part of a comprehensive odor-control program.

- The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.
- Operational techniques shall be used to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.
- Solid waste shall be placed within 1 hour of its arrival at the working face.
- The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared.
- To ensure that no odors emanate from the project site, appropriate control measures shall be implemented. These measures include the application of daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.
- To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include:
 - Sample Probe Installation: One monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils.
 - Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 parts per million (ppm).
 - Ambient Air Samples: Twenty-four-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.
 - Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane. Measurements at any one point

on the surface of the landfill shall not exceed the SCAQMD's standard of 500 ppm.

- Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.
- LFG flaring systems shall be sited as required by the SCAQMD and constructed using best available control technology (BACT). The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City LEA. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.

Comment 101: For the proposed City/County Landfill Project, is the maximum allowable daily tonnage proposed at 11,000 tons per day or 14,500 tons per day (e.g., including County inert and green waste tonnage permitted in County Conditional Use Permit)?

Response 101: Until the proposed landfill and current operational landfill are combined, the initial proposed landfill would provide an average waste intake rate of 5,000 tpd in the City portion of Sunshine Canyon and 6,000 tpd at the County Landfill. The ultimate City/County Landfill would combine landfilling operations and would allow for an average waste intake rate of approximately 11,000 tpd. The maximum net tonnage that could be deposited per operating day is 12,100 (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County) with a maximum weekly intake rate of 72,600 tons (an average of 11,000 tpd based on 6 working days per week).

Currently, the County Landfill is receiving approximately 4,000 tpd of solid and inert waste, which is below its permitted amount. The Draft SEIR prepared for the proposed City/County Landfill analyzed impacts associated with a 12,100-tpd waste intake rate (refer to Sections 4.2, Air Quality, pp. 4-45 through 4-96, and Section 4.13 Transportation and Circulation, pp. 4-333 through 4-388 for a discussion of air quality and traffic impacts and proposed mitigation measures associated with the Sunshine Canyon Landfill Project).

Comment 102: What safeguards exist to prevent the landfill gas collection and flaring system from exploding and starting a major fire?

Response 102: The purpose of the LFG collection system is to control LFG emissions to the atmosphere and the lateral migration of LFG through the soil. SCAQMD Rule 1150.1 (Control of Gaseous Emissions from Active Landfills) requires the installation of an LFG control system sufficient to draw LFG toward the gas collection devices without overdraw that could adversely affect the system. The LFG collection and flaring system would be installed for the proposed City/County Landfill to collect gases generated by the decomposition of refuse. A series of horizontal and vertical gas collector wells would be designed to minimize the possibility of onsite or offsite gas emissions and odors to levels in compliance with regulatory standards. Gases would be collected by vacuum extraction,

and vacuum levels would be maintained so that excessive quantities of ambient air would not be drawn into the landfill waste. The gas is metered for flow rate, passes through a flame arrestor, and then continues to the flare where it is combusted.

The horizontal gas collection system would be installed immediately upon site preparation and would be expanded as necessary to ensure compliance with SCAQMD Rule 1150.1, which limits the amount of surface emissions from landfills. Where the horizontal collector pipes terminate, the pipes will be connected to an operating LFG header line tied to the main header system. Control valves would be placed at each of the main header connections to maintain optimum flow control at connections and ensure that both proper vacuum and volume are maintained so that air infiltration is minimized. The vertical gas collection wells would be constructed, if needed, after final landform elevation is achieved for a particular area (i.e., outward facing-slope area).

In order to control landfill odors and help prevent the potential migration of LFG gas, two additional high-efficiency flare stations would be constructed within the City portion of Sunshine Canyon to incinerate and destroy the collected gas at the City/County Landfill. The system would include a cylindrical-shaped, insulated metal flare shroud approximately 13 feet in diameter and 50 feet in height. The gas flaring system would contain automatic shutdown and alarm systems and an automatic-combustion, air-regulating, and temperature controller. When the flare is in operation, a minimum temperature of 1,600°F would be maintained in the flare stack. The flare stack would be designed to contain the flame internally within the cylindrical stack, thus eliminating the visibility of the flame. The combustion products from the flare are released into the atmosphere. Sample ports are provided to allow for the sampling of raw gas and incinerated emissions to ensure adherence to SCAQMD rules and requirements. In addition, each flare station would be equipped with spare blowers to ensure continuous operation of the active LFG collection system during periods of maintenance or in the event of blower malfunction.

LFG entering the flare would be analyzed weekly for heating value and methane concentration. The testing results would be recorded and provided to SCAQMD upon request. If any breakdown or malfunction of the LFG flare system results in the emission of raw gas, the project proponent is required to report the occurrence within 1 hour to SCAQMD's Director of Enforcement. Remedial measures will be undertaken immediately to correct the problem. In case of potential flare failure, automatic alarms would be installed, including an automatic notification system, and a LFG shutoff system. These alarms would provide immediate indication of a flare flame out, low flare stack temperature, high flare stack temperature, excessive vibration, or low blower discharge pressure.

Annually, each flare station would have a performance check conducted by an independent laboratory in accordance with SCAQMD testing methodologies and protocol, which are approved by SCAQMD. In addition, SCAQMD would be notified 7 days prior to testing so that an observer may be present during testing.

Implementation of the LFG monitoring program would meet or exceed applicable State and federal regulations. Monitoring and controlling LFG from any landfill located within

the jurisdiction of the SCAQMD are required pursuant to SCAQMD Rule 1150.1 and regulations pertaining to gas control referenced in CCR, Title 27, Division 2, Chapter 3, Article 6, § 20919 (Gas Control) and federal regulations contained in 40 CFR, § 258.23.

The project proponent would install permanent LFG monitoring probes around the perimeter of the landfill, as necessary, to ensure that LFG is not migrating offsite through the subsurface soils, as well as monitor ambient air quality and onsite facilities for the presence of LFG. One probe per 1,000 feet of landfill perimeter is proposed to be installed in locations of greatest concern. Monitoring the perimeter gas migration system would be conducted to determine the effectiveness of the system in controlling potential offsite migration. Monitoring would help achieve proper maintenance of the interior gas extraction system by focusing on potential gas leaks, liquid seeps, or potential equipment failures. The landfill surface would be periodically monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm. Periodically, 24-hour integrated ambient air samples would be collected and required meteorologic data would be recorded to assess any impacts the landfill would have on ambient air quality at the landfill perimeter. Instantaneous monitoring of the landfill surface would also be done to determine that the maximum concentrations of ROGs, measured as methane, do not exceed SCAQMD's standard of 500 ppm. Detection of potential odors that could be associated with the release of LFG and daily landfilling operations would be monitored on a regular basis.

As mentioned above, numerous safeguards would be implemented to prevent the LFG collection and flaring system from potential risk-of-upset conditions. Specifically, the gas collection and flaring system would use such devices as flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety shutdown devices would be designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, would be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system would be performed after ground shaking from an earthquake, and necessary action would be taken to correct any potential problems.

Comment 103: How does the leachate collection and treatment systems work? How does the public know if recirculated leachate (e.g., after treatment) is safe to use for dust control?

Response 103: The proposed LCRS would be installed directly on top of the liner system in all areas of the proposed landfill footprint, including the side-slope and waste-on-waste areas of the existing inactive landfill. This system would be constructed, maintained, and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS would be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. The LCRS will also be designed and constructed to maintain less than a 12 inch depth of leachate over the liner.

The LCRS would be of the blanket type and overlay the flexible membrane liner (FML). This blanket system would include high-density polyethylene (HDPE) slotted pipes embedded into the drainage blanket of free-draining material. The drainage blanket

would be a minimum of 1 foot in thickness, cover the bottom (or floor) of the canyon, and be connected to the side-slope geonet LCRS. The drainage blanket would collect and direct the intercepted leachate toward leachate sumps where it is collected and removed from beneath the waste. The blanket system would be sloped toward the sumps to prevent ponding of leachate.

The proposed LCRS drainage network would be designed and engineered to withstand the potential effects of seismic events. The HDPE pipe selected for the proposed LCRS drainage network would have the ability to deform without leakage during potentially strong earthquakes. In addition, the HDPE piping would be chosen because of the material's compatibility with a wide variety of chemical constituents that could be in the leachate and its availability in various diameters and thicknesses. Typically, the HDPE pipes have a structural capacity to adequately support anticipated overburden loads. The primary conduit for leachate flow would be within the gravel drainage blanket surrounding the perforated HDPE pipe and would direct leachate flow by gravity to the drainage corridors and LCRS sumps. The LCRS sumps would be located at the downslope limit of the proposed landfill footprint. The sumps are designed to be the lowest points in the landfill, where leachate would flow. Overlying the LCRS drainage layer would be a geotextile filter fabric and a minimum 2-foot-thick protective soil layer upon which the refuse would be placed.

With respect to the leachate treatment system, the leachate produced from refuse is a highly complex liquid mixture. The quantity of leachate formation depends on the composition of the refuse, periods of landfilling operation, and the combined physical, chemical, and biological activities, such as temperature, moisture content, moisture routing, depth of fill, stage of decomposition, ability of intermediate soil layers to remove contaminants, and quality of water entering the landfill. Chemical characteristics are affected by the biological decomposition of biodegradable organic materials, chemical oxidation processes, and dissolving of organic and inorganic materials in the waste. The leachate's chemical composition will change as the landfill goes through the various phases of decomposition, similar to changes in methane gas production.

Leachate collected by the LCRS would be directed by gravity to sumps and then discharged to a leachate transmission pipeline for conveyance to a storage tank at the leachate treatment facility. The flow capacity of the pipeline would exceed anticipated leachate flow rates. The leachate volume and its characteristics would be monitored closely at the storage tank by periodic sampling and analysis.

Effluent from the leachate treatment facility is sampled and tested for contaminants and a bioassay test is conducted. If these tests show that the effluent is acceptable, it is used for irrigation or dust control.

Approval for the reuse of treated leachate and water at the proposed City/County Landfill would be obtained from the LARWQCB. This system would be similar to the one currently in place at the operational County Landfill.

Comment 104: How does BFI control litter for the County Landfill operation? How will litter be controlled once the proposed City/County Landfill reaches higher elevations?

Response 104: BFI uses several operational methods and programs that control litter onsite and offsite. For example, at the operational County Landfill, the working face area is kept to a very small size. After refuse has been unloaded on the working face, a compactor (with a weight of approximately 100,000 lbs.) spreads and compacts the waste. Each 2-foot layer of waste is compacted with a minimum of five passes over the surface area. Compaction of the refuse greatly reduces blowing litter and debris. Both litter fences and vacuum trucks are also used to control litter.

On a daily basis, the operations manager assigns landfill employees to patrol the project site for fugitive litter from disposal operations and incoming or outgoing vehicles. This procedure is conducted during operating hours and after the landfill facility closes.

Comment 105: How many employees does BFI have at the landfill?

Response 105: Currently, there are 52 employees at the County Landfill. It is anticipated that the proposed City/County Landfill will require an additional 35 employees for a total of 87 employees.

2.4.2 Comments Received at the Land Use Station

Comment 106: Are there any more discretionary actions required after the General Plan Amendment and Zone Change?

Response 106: The following discretionary approvals will be required in addition to the requested GPA/ZC.

- ▶ Nationwide Permit - No. 26 or other 404 Permit - issued by the Corps.
- ▶ Solid Waste Facilities Permit - issued by the CIWMB.
- ▶ Streambed Alteration Permit - issued by the CDFG.
- ▶ Water Quality Certification - issued by the State Water Resources Control Board (SWRCB).
- ▶ Waste Discharge Requirements and Compliance with Federal Municipal Solid Waste Landfill Wetland Siting Regulation - issued by the LARWQCB.
- ▶ Authority to Construct and Permit to Operate - issued by the SCAQMD.
- ▶ Finding of Conformance - issued by the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (SWMC/IWMTF).
- ▶ Amended Conditional Use Permit and Working Arrangement (form of agreement between the City and County regarding the joint development, operation, maintenance of the ultimate landfill) approval by the County of Los Angeles Regional Planning Commission and Board of Supervisors.

- Certification of Final SEIR, approval of CEQA Findings, Statement of Overriding Considerations, MMRP, Oak Tree Permit, and Working Arrangement - approved by the City of Los Angeles Planning Commission and City Council.

Comment 107: What conditions would be attached to the project?

Response 107: Extensive Q (qualified classification) conditions would be imposed on the rezoning of the project site to M3; conditions would be imposed on the General Plan Amendment and some form of working arrangement (see above-noted City/County agreement) would be required relative to the joint development and operation of the City/County Landfill, since it will be located within both the City and County jurisdictions. It is anticipated that this agreement would impose similar conditions to those already in effect for the existing operational County Landfill (i.e., CUP conditions). Additionally, the majority of mitigation measures that are proposed for the City/County Landfill Project would become project conditions in one or more of the above-noted entitlements.

Comment 108: Is there a time limit for the County Landfill conditions?

Response 108: There is no time limit for the County Landfill operations. The County Landfill CUP allows filling of 215 acres to set elevations. Based on current volumes, the County Landfill is anticipated to be filled in approximately 9 years, or in the year 2005. This estimate is contingent upon BFI reaching its approximate 17-million-ton landfill capacity within the County.

Comment 109: By zoning the entire BFI ownership area to an M3 zone, including the 100-acre buffer area, to industrial would the City be encouraging other heavy industrial and manufacturing uses to move into the area, thereby decreasing residential property values? Also, would the M3 zone allow BFI to develop a more intense use than the proposed project without further public notice?

Response 109: The zone change would not likely encourage other industrial uses to move into the area, since this area already contains extensive industrial uses, including City DWP's Balboa substation, MWD's Joseph Jensen Filtration Plant, Cascade Oil Field, heavy equipment storage yards, and warehouses. Historically, the landfill has not encouraged other industrial developments (either directly or indirectly) into the immediate area.

As to the second comment, the uses allowed under the proposed GPA/ZC would be limited to landfilling and ancillary facilities. Accordingly, any development other than the proposed landfill project would require a separate set of land use approvals with additional environmental review and comment. As part of that process, responsible agencies, organizations, and the public would be notified by the City. Furthermore, if any substantial modification or increased density due to the proposed landfill project were to occur, additional environmental review and public comment would likely be required.

Comment 110: Why isn't a variance being requested?

Response 110: Prior to filing applications for the proposed City/County Landfill, the project proponent's counsel held discussions with City Planning to determine the most appropriate course of

action for project processing. As a result of those discussions, the project proponent requested a GPA/ZC for the entire ±494 acre project site within the City's jurisdiction. The City's Granada Hills-Knollwood Community Plan designates the land use on the project site as "Open Space." Development of the project would require a general plan amendment to "Heavy Industrial" to be consistent with the existing and proposed uses as well as the proposed zone change. The proposed ZC would change the existing zoning designation from A1-1-O (Agricultural, Height District 1, Oil Drilling District Overlay designation) to M3-1-O (Heavy Industrial, Height District 1, Oil Drilling District Overlay designation) pursuant to the City PZC §11.5.8 and §12.32. The requested zone change would also authorize the development, operation, and maintenance of proposed uses in the City.

Under the City's PZC, § 12.20.37(I), the M3 zone permits landfilling uses. As further defined under that section, "None of those uses which may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise, vibration and the like . . . shall be located nearer than 500 feet to a more restricted zone." In this regard, landfill operations would be located within 500 feet of the more restrictive zoning designation of A1. The proposed landfill footprint would be approximately 1,700 feet from the nearest residential unit (located south of the project site). In addition, the ±100 acre open-space area provides a significant separation between the proposed uses (i.e., landfill and ancillary facilities) and the residential areas within Granada Hills. Implementation of the zone change would remedy existing zoning inconsistencies that relate to the inactive landfill's closure and postclosure maintenance requirements.

Refer to Responses 18, 51, and 89 for an additional discussion of project entitlements being requested by the project proponent.

Comment 111: How close are the nearest homes in Granada Hills to the landfill?

Response 111: The nearest residential unit is located next to Timber Ridge Drive, approximately 1,700 feet from the proposed City/County Landfill footprint boundary. Several residential housing and light industrial projects have been developed proximate to the project site. These developments include several residential (single-family) housing tracts. All of these uses are located south of the intervening ridgeline that ranges in elevation from 2,150 to 1,725 feet MSL.

Perimeter ridgelines surround the project site and range in elevation from ±2,150 feet MSL to the southwest and ±1,950 feet MSL near the western perimeter of the ±100 acre open-space area. The existing southern fill limits of the inactive landfill (i.e., larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills. The highest fill elevation of the proposed City/County Landfill footprint is 2,000 feet MSL. At this elevation, the top deck area is and would continue to be higher than the northern perimeter ridgeline, which is 1,825 feet MSL. However, due to the location of the final fill area, well within the interior of Sunshine Canyon, exterior perimeter ridgelines would not be visually impacted.

Also, refer to Responses 7 and 13.

Comment 112: Where is the East Canyon Dedication Area and what does it mean?

Response 112: East Canyon is located west of BFI's project boundaries. Prior to the opening of the County Landfill, the project proponent dedicated over 426 acres within East Canyon for open space and recreational purposes and is arranging for additional dedication of road and trail easement areas. The total dedication within East Canyon will encompass approximately 507 acres. This acreage has become part of the Santa Clarita Woodlands Park. Additionally, the project proponent is in the process of obtaining parcels (over 480 acres) located along the northern and western boundaries of Upper Bee Canyon for wildlife preservation and recreational use. This acreage will become part of the Santa Clarita Woodlands Park. Both the East Canyon and Upper Bee Canyon parcels, along with the adjoining O'Melveny Park to the south, will ultimately provide 1,681 acres of open space, park, and recreational areas for public use.

Comment 113: What wind speed would require landfill operations to be shut down?

Response 113: Wind speed is not the sole criteria to determine when landfilling operations should be curtailed. Wind speed on the project site is continually monitored using onsite anemometers.

With respect to the proposed project, the project proponent will provide adequate mitigation measures to control fugitive dust in accordance with SCAQMD Rules 402 and 403, and to minimize offsite migration of windblown dust from the landfill extension site.

Compliance with Rule 403 specifically requires the application of additional mitigation when wind speeds exceed 25 mph based on either SCAQMD forecasts or onsite monitoring. If the mitigation measures provided in the Draft SEIR do not curtail fugitive dust to the extent required by the SCAQMD, or such that visible emissions create a nuisance as per Rule 402, the SCAQMD will require the project proponent to include additional mitigation measures (above those recommended in the Draft SEIR), or cease operations.

Comment 114: At what elevation does dust migration become a problem (e.g., compatibility [sic] of adjoining land uses)?

Response 114: Refer to Response 113. Dust migration would be controlled so that it would not become a problem with adjoining land uses. The proposed landfill would be operated and maintained in conformance with SCAQMD Rules 402 (Nuisance) and 403 (Fugitive Dust) to minimize dust migration. In addition, several mitigation measures contained in the Draft SEIR (pp. 4-86, 4-88, and 4-90) will become conditions of approval for the proposed project. These mitigation measures are listed under Response 98.

Comment 115: Why is a landfill being proposed at this location?

Response 115: It is preferable for the landfill to be developed in areas that are disturbed. The area planned for development has been disturbed due to existing and prior landfilling

operations taking place since 1958. Moreover, it would be adjacent to current County Landfill operations. Disturbance to environmental resources would be minimized because development would occur in areas already disturbed. In addition, development will connect both the operating County Landfill with areas of the inactive landfill and other areas into one landfill footprint. Existing infrastructure is already in place to accommodate future development; therefore, impacts associated with the development and/or installation of infrastructure would be minimized.

Currently, in Los Angeles County, approximately 36,000 tons of solid waste are disposed of in landfills each day, after recyclable materials are taken out of the waste stream. Available landfill space within the Los Angeles region is rapidly diminishing due to the closure of existing landfill facilities. The development of the proposed project would provide an estimated waste disposal capacity of 90 million tons for an estimated 26 year site life.

Development of this landfill is necessary in order to provide needed solid waste disposal capacity to the residents living within the City and County of Los Angeles. The location within the County would minimize transportation costs, thereby providing cost-effective, short-, mid-, and long-term solid waste disposal capacity for residences and businesses within the Los Angeles region.

Comment 116: What if the proposed operation is too close to homes?

Response 116: See Response 111. In addition, development of the proposed landfill will be designed in accordance with all applicable federal and State regulations and requirements using both emerging and existing technologies. Various environmental protection and control systems will be installed onsite and regulated by numerous regulatory agencies. Also the landfill manager and a resident caretaker are available to immediately resolve any problems regarding landfill operations.

Comment 117: What proof is there that the landfill will not adversely affect the economic value of homes near the landfill site?

Response 117: Implementation of the proposed City/County Landfill is not anticipated to impact the property value of existing residential units proximate to the project site. Several economic valuation studies have been prepared on landfills in the Southern California area that address this issue.

Additionally, a residential valuation study was prepared by Dr. Chapman Finley of JurEcon, Inc., for the Sunshine Canyon Landfill County Expansion entitled *An Evaluation of the Sunshine Canyon Landfill's Impact on the Value of Homes in Adjacent Residential Neighborhoods* (November 1988) and provided in the *Draft Environmental Impact Report, Sunshine Canyon Landfill Extension, Responses to Comments, Volume A, Appendix 7*. Based on this study, which compared neighborhoods adjacent to the project site with four similar residential areas located at specified distances from the site, it was determined that the existing inactive landfill (when operational) had no discernible economic impact on property values in the immediate area.

This study evaluated the landfill's effect on the sale price of homes or the rate of price appreciation of homes in defined areas. Data were compiled on more than 2,000 home sales transactions within the Granada Hills area and spanned over a 10-year period. A model was constructed by JurEcon, Inc., to delineate transaction prices in terms of year of sale, housing variables (for example, size and year built), and neighborhood variables.

The study concluded that the proposed landfill would not affect housing values. As noted in the study, homes of given characteristics adjacent to the landfill would on average sell for the same price as a similar homes in a comparable neighborhood at some distance from the landfill. Furthermore, once adjustments for prestigious neighborhood differences were made, a home adjacent to the landfill could even be expected to sell for the same price as a similar home in a noncomparable neighborhood. The lack of a statistically significant difference between the target neighborhoods adjacent to the landfill and comparable neighborhoods indicated that the Sunshine Canyon Landfill did not impact local housing prices.

A similar study was conducted for the Puente Hills Landfill (a 12,000-tpd landfill facility) during its environmental review. That study was conducted in 1989 by Parkcenter Realty Advisors to assess the impacts on residential property values near the Puente Hills Landfill. Sales data were compared between two study areas near the landfill and two control groups with similar housing located at a distance from the landfill. The two study areas consisted of single-family residential homes located in Western Hacienda Heights and Avocado Heights. The two control groups chosen were located in south-central Hacienda Heights and Rowland Heights.

Sales data were analyzed using overall price levels, price per square foot, and appreciation rates over a 5-year period as indicated by resales. The average price per square foot in the study areas closely mirrored those of the control areas with nearly identical patterns of price trends. A review of resale information indicated a consistent range of annual average appreciation rates for each of these four areas. The highest rates of appreciation for individual resales were experienced in the study areas. Median home prices for the study areas were within the range of those of the control areas with the exception of a dissimilar portion of Avocado Heights. Also, all areas experienced lower annual increases during 1984 to 1986 because of a sluggish real estate market. A regression analysis was used to incorporate all data collected. The results of this analysis supported an earlier study on values to property (adjacent to the Puente Hills Landfill) that was conducted in 1983. Based on the two studies conducted in 1983 and 1989, single-family residential property values near the Puente Hills Landfill were not adversely affected by their proximity to the landfill.

2.4.3 Comments Received at the Biota Station

Comment 118: What are the ages of the trees that were removed in Sunshine Canyon during construction of the County Landfill? Weren't these trees several hundred years old?

Response 118: Prior to tree removal, a tree age sampling program was prepared by BFI in cooperation with the Los Angeles County Forester. The intent of the program was to gain objective age sampling data from trees located within various areas of Sunshine Canyon. Trees

growing on each of the aspects, such as the canyon bottom and ridgelines, were sampled at the time of cutting. The sample consisted of slicing the entire tree trunk. Samples were clearly marked and brought to the Sunshine Canyon Landfill Plant Materials Center for processing and aging. A duplicate set of samples was used by the County Forester to age the trees by ring count.

The oldest tree removed from the canyon was 110 years, and the average age was 75 years. Only 9 percent of the trees were 100 years or older. Many of the trees are regrowth trees, started from an older stump following natural wild fires or an earlier wood cutting.

Comment 119: After the inactive City Landfill is closed, how will it be revegetated? What plants will be used? How can you plant trees on the landfill cap when it is only a few feet deep?

Response 119: The inactive City Landfill will be revegetated with a combination of grasses, shrubs, and native and nonnative trees to recreate a variety of habitat types and provide visual amenity to the area. Direct seeding, hydroseeding, and seedling planting will be used to establish the plant communities. In addition, some salvaged topsoil will be used to enhance the growth and establishment of these plants. A combination of native and nonnative plants will be used, focusing primarily on the native grassland and shrub communities. Portions of the final cover design for the inactive landfill will consist of a 1-foot-thick vegetation erosion control layer overlaying a 5-foot-thick monolithic barrier. In those areas, trees and other deep-rooted plants will be planted. Different type of plants in a varied setting are proposed.

It should be noted that the final closure and postclosure maintenance plans are currently pending before the City.

Comment 120: Why does revegetation on the existing, inactive City Landfill look so miserable?

Response 120: The final closure and postclosure maintenance plans (which includes the revegetation program) for the existing inactive landfill are pending regulatory approval. The revegetation efforts on the inactive landfill within the City are temporary. The design and intent of the temporary work on the inactive landfill were to control erosion and fugitive dust emissions. Erosion and dust control are effectively being controlled on the landfill. Also, refer to Response 119.

Comment 121: For BFI revegetation why are oak trees replanted in combination with other, less desirable types of trees?

Response 121: With respect to oak tree permit requirements for the County Landfill, BFI is required to plant oak trees within mitigation planting areas. No other native or nonnative trees are planted in these areas. At one time, nonnative trees were planted within the south berm area or ±100 acre open-space area of the project site. These trees are a temporary nursery crop and were used due to the harshness of the site.

Comment 122: Why doesn't BFI provide water sources for animals displaced by landfill development? Is it true that the loss of natural springs in the County is forcing large animals (e.g., mountain lions) to enter adjacent developments in search of food and water?

Response 122: The development of the County Landfill removed two ephemeral springs from the canyon area. Similar to Sunshine Canyon, the Oat Mountain area consists of many finger canyons, some of which had and still have springs. The seasonal springs in Sunshine Canyon are part of the available watershed in the area. Adjacent open space areas, such as Bee and East Canyon provide water sources for animals displaced by landfill development. Bee Canyon contains water in the mid and upper canyon reaches and East Canyon supports seasonal water in the lower reaches.

2.4.4 Comments Received at the Engineering Station

Comment 123: Is it true that the inactive City Landfill suffered extensive damage during the 1971 San Fernando Earthquake and the 1994 Northridge Earthquake?

Response 123: The City Landfill experienced only minor impacts during the 1971 San Fernando and the 1994 Northridge earthquakes. Extensive field investigations, including geologic mapping and logging of exploratory trenches by both consulting geologists and California Division of Mines and Geology (CDMG) representatives, indicate that fault rupture from the 1971 San Fernando earthquake did not occur within the project site boundary and that known fault traces within the site boundaries do not show evidence of fault displacement in Holocene time.

The 1994 Northridge earthquake produced no significant adverse impacts within the project site. No cracking or deformation in the waste mass was found at the base of the existing inactive City Landfill by consulting geotechnical engineers or the University of California at Berkeley's reconnaissance team. Minor cracking that was observed was limited to the intermediate cover soils, with no waste exposed. The minor cracks were repaired immediately by placing additional cover soil material over the affected area(s). Similarly, no significant seismically induced displacement was observed in the natural slopes surrounding the existing inactive City Landfill.

The performance of the existing inactive City Landfill in the Northridge earthquake and observations of the performance of other solid waste landfills in major earthquakes indicate that solid waste is extremely resistant to the effects of strong ground motion and is not susceptible to loss of strength or large internal displacements due to earthquake shaking (as is the case for some earthen materials [e.g., loose, saturated sand]). The waste mass of the existing landfill and solid waste placed within the proposed fill areas is expected to perform well when subjected to strong shaking from earthquakes, with no loss of strength and little internal deformation.

Comment 124: It is [sic] true to state that the proposed liner system would not be able to withstand the effects of a massive earthquake from an underlying blind thrust fault?

Response 124: The seismic design criteria used for the proposed City/County Landfill liner exceeds the seismic design criteria for landfill liners as stipulated by State regulatory agencies. The landfill liner has been designed to resist the effects (i.e., ground acceleration and displacement) resulting from a Magnitude 6.9 earthquake on the Santa Susana Fault. This earthquake magnitude represents the maximum credible earthquake (MCE). The MCE design criteria are more stringent than California seismic design standards for Class III

solid waste landfills contained in CCR, Title 27, §20370. The landfill liner has also been designed to resist the effects of an MCE on the San Andreas Fault (a Magnitude 8.3 earthquake). These two events represent a conservative design for the landfill and are protective of the liner system and the environment.

Comment 125: Can water permeate the base liner?

Response 125: The base liner is designed to prevent water penetration because its design will include a minimum 2-foot-thick low-permeability soil liner overlain by a flexible geomembrane liner, overlain by a minimum 1-foot-thick granular drainage layer. Refer to Figure 2.7-1 of the Draft SEIR. The properties of these liner components exhibit extremely low values of saturated hydraulic conductivity. The base liner, including the granular drainage layer, is designed to contain and route water and/or leachate, if encountered, through the granular drainage layer to low points, where liquids would be gathered in collection sumps. This design helps prevent the ponding of liquids on top of the liner system, which makes the possibility for water to permeate the base liner even more remote. The sumps are monitored and periodically pumped, as necessary, to remove any accumulated liquids. Refer to the Draft SEIR, Section 4.3, Surface and Groundwater.

Comment 126: What is landfill squeeze? How will landfill settlement and squeeze affect the waste-on-waste liner system?

Response 126: “Landfill squeeze,” as it is referred to in the above comment, is taken to be a reference to the settlement of a waste mass that is directly attributed to the weight of overlying waste, causing waste settlement that is not a result of the landfills internal refuse decomposition. This type of waste settlement, caused by the weight of the overlying waste, is referred to as self-weight densification. Designing a waste-on-waste liner system that maintains the integrity of the waste containment unit when differential settlement occurs can be addressed in two ways. The first approach is to minimize the potential for the existing waste to settle differentially. The differential settlement potential of the waste can be minimized by the compaction of the buried waste (i.e., deep dynamic compaction or waste surcharge). The second approach is to design the liner system to maintain its integrity when existing waste settles. To accomplish this, the waste-on-waste liner system is typically designed using a compacted soil foundation layer that is placed under the composite liner component. The compacted foundation layer may be reinforced with either a geogrid or geotextile layer. For the proposed City/County Landfill, this second approach is the preferred method, which would incorporate a compacted soil foundation layer to take advantage of an engineered final cover on the side slopes of the existing inactive City Landfill and to achieve an economical design while maintaining environmental protection.

Comment 127: Why does the design of the landfill utilize 2:1 side slopes rather than 3:1 side slopes?

Response 127: The proposed landfill design will use a 2:1 fill slope rather than 3:1 to provide for maximum disposal capacity within Sunshine Canyon. This design will also provide the maximum potential landfill capacity for the set footprint and elevations.

Some of the natural canyon slopes at the project site are steeper than 1-foot horizontal to 1-foot vertical (1H:1V). The typical inclination of the natural canyon slopes is 2H:1V. Stability analyses of the existing landslides indicate that, unless adverse (out-of-slope) bedding conditions are present, 1H:1V slopes in the native material are stable under both static and seismic loading. When adverse bedding is present, slope angles of 2H:1V or flatter may be required to provide adequate stability. Pseudostatic stability analyses for seismic loading and observations of the performance of slopes at the site during the 1971 San Fernando and 1994 Northridge earthquakes indicate that, when natural slopes at the project site exhibit adequate static stability, the slopes perform well under seismic loading.

With respect to engineered slopes, landfills have generally been found to be stable under static and seismic loading conditions. Waste faces as steep as 1.3H:1V with a height of 150 feet are known to be stable under both static and moderate (0.25-g peak ground acceleration) seismic loads. Waste faces with an inclination of 2H:1V have remained stable under severe seismic loading, as evidenced by the performance of landfills in the Loma Prieta, San Fernando, and Northridge earthquakes. The advent of geosynthetic liner and cover systems with relatively low interface shear strengths adds a new element to landfill design that must be considered in assessing static and dynamic stability. However, the performance of geosynthetic-lined landfills in earthquake events, such as the Northridge earthquake, indicates that properly designed geosynthetic-lined landfills can withstand strong ground motion from earthquakes without damage.

Comment 128: Is it true that the inactive City Landfill is hydrogeologically connected to the San Fernando Valley Groundwater Basin?

Response 128: The Watermaster for the Upper Los Angeles Basin Area has concluded that the natural bedrock material underlying the canyon is of low permeability and has low storage capability. A report prepared for the City Bureau of Sanitation on groundwater movement in Sunshine Canyon stated, "Whatever groundwater movement does occur is undoubtedly complicated and slow. Complications include the bedding, which, although generally dipping towards the east in the lower canyon, dips steeper than the hydraulic gradient making it necessary for the groundwater to move across the bedding. Interbeds of siltstone and shale act as subsurface dams with little or no permeability. Groundwater quality is poor." After independently reviewing published hydrogeologic reports for the Sunshine Canyon area, the Watermaster concluded that, other than through the alluvium, there was no groundwater connection between Sunshine Canyon and the San Fernando Basin.

Within Sunshine Canyon, groundwater follows the topography and moves down slopes (flowing in a south to southeast direction), continuing toward the valley axis. The movement of shallow groundwater follows the direction of surface drainage. Water stored in the alluvium and shallow bedrock generally flows below grade within the canyon. Groundwater in the bottom of the canyon flows slowly toward the mouth of Sunshine Canyon.

Due to the pervasively folded, faulted, and anisotropic nature of the bedrock (i.e., interbedded sandstone and shale), the flow rate of groundwater at the project site can vary

significantly over short distances. However, the presence of nonactive faults in addition to interbeds of low-permeability shale and mudstone tends to restrict the flow of groundwater. Subsurface water in Sunshine Canyon is effectively hydraulically separated from the San Fernando Valley alluvium by the low-permeability bedrock. Groundwater flow in the bedrock is not continuous between the canyon and valley floor area.

Comment 129: Is it true that the proposed project would adversely affect the Los Angeles Reservoir and thereby adversely impact the drinking water of the entire Los Angeles area?

Response 129: The proposed project would not adversely affect the Los Angeles Reservoir or impact the drinking water of the entire Los Angeles area. Surface water from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert, which is maintained by the City BOE. That culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the landfill entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir.

Additionally, the Los Angeles Reservoir is located south of the Los Angeles Aqueduct Filtration Plant approximately 2 miles south of the project site. The Los Angeles Reservoir is the City's largest reservoir in surface area and the second largest in capacity of any DWP reservoir in the City. The facility has lined sides and a compacted earth fill dam.

2.4.5 Comments Received at the Environmental Station

Comment 130: Why wasn't the traffic modeling based on a maximum daily intake tonnage of 14,500 tons per day (e.g., City/County Landfill maximum tonnage plus County inert and green waste tonnage)?

Response 130: The Draft SEIR prepared for the proposed City/County Landfill analyzed impacts associated with combined landfiling operations, allowing for an average waste intake rate of approximately 11,000 tpd. The maximum net tonnage that can be deposited per operating day is 12,100 (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County) with a maximum weekly intake rate of 72,600 tons (an average of 11,000 tpd based on 6 working days per week). This total includes an average of 1,100 tpd of inert waste or peak volume disposed waste.

Comment 131: Why did the traffic analysis predict an extremely high percentage of transfer trucks in comparison with other waste-hauling vehicles, when current conditions at the County Landfill show that curbside collection vehicles represent far-and-away the highest percentage of waste-hauling vehicles?

Response 131: It is anticipated that the primary source of truck traffic into and out of the landfill facility will be from transfer trucks or smaller residential collection vehicles. Based on information provided by the project proponent and subsequently verified by the LADOT, residual refuse brought from transfer stations will account for approximately 46 percent of the total daily waste intake into the facility. In addition, based on the maximum intake

rate of 5,500 tpd, approximately 2,550 tpd of refuse (or 46 percent of the maximum daily intake) would originate from transfer stations/material recovery facilities. It is anticipated that approximately 660 transfer trucks (daily/two-way) would be used to transport the waste from these facilities to the proposed site. Transfer trucks are typically 60 feet long and can accommodate a waste capacity of approximately 23.5 tons.

Curbside collection vehicles would transport approximately 2,850 tpd (or 52 percent of the maximum daily intake) of the total daily waste intake. Typical curbside collection trucks are 40 feet long and accommodate a capacity of 9 tons. The remaining source of transport would originate from local deliveries (e.g., landscapers, gardeners). Approximately 100 tpd (or 2 percent of the maximum daily intake) of the daily waste intake would be transported by these types of vehicles. It is also anticipated that, on average, approximately 125 half-ton and three-quarter-ton trucks (or self-haul trucks) would transport refuse to the project site.

Comment 132: How many trucks are currently entering the landfill on a daily basis?

Response 132: On a daily basis, there are 600 trucks inbound and outbound. Currently, the County Landfill accepts up to 4,000 tpd of waste.

Comment 133: What are the public health effects of diesel trucks generating dust and airborne emissions?

Response 133: The Draft SEIR discussed mobile sources such as emissions from motor vehicles, including tailpipe and evaporative emissions. These sources are classified as either on-road or off-road. On-road sources are a combination of emissions from automobiles, trucks, and indirect sources. Indirect sources are sources that by themselves may not emit air contaminants; however, they indirectly cause the generation of air pollutants by attracting vehicle trips or consuming energy.

Specifically, the Draft SEIR, Section 4.2, Air Quality, discussed both construction-related or short-term impacts and operational or long-term impacts. Project construction would include initial site excavation and grading activities, including clearing and grubbing of all surficial vegetation, leveling unpaved areas, site excavation for the landfill base liner system, and installation of the environmental protection and control systems. Construction-related air pollutant emissions are associated with site preparation and construction phasing of the proposed project and include fugitive dust emissions and exhaust emissions from construction equipment, material delivery trucks, and workers' vehicles.

With respect to the public health effects of diesel trucks generating dust and airborne emissions, the Draft SEIR, Section 4.2, Air Quality, indicated that residual air quality impacts are expected to remain significant for criteria pollutants (i.e., NO_x, ROG, and PM₁₀) due to project implementation. Regional emissions of all criteria pollutants (i.e., CO, NO_x, ROG, SO_x, and PM₁₀) will decrease by reduced mileage traveled within the South Coast Air Basin. Emission levels for CO and SO_x are projected to remain below their applicable threshold levels. Furthermore, CO emissions are not projected to exceed either State or federal ambient air quality standards or create "hot spots."

The projected PM₁₀ emissions from fugitive dust, when added to the projected PM₁₀ emissions attributable to vehicle exhausts, produce approximately 231 pounds of PM₁₀ emissions per day. This value is in excess of the 150-pound-per-day significance criterion recommended by the SCAQMD; therefore, a significant impact is projected.

Comment 134: How does the public know that the proposed City/County Landfill won't result in sinus and respiratory problems for people living down-wind of the project site?

Response 134: Historically, the Sunshine Canyon Landfill has not been a reported source of respiratory problems within the community of Granada Hills. To date, no documentation or information has been received by either the City/County, County health agencies, or regulatory agencies that would link the Sunshine Canyon Landfill (either the existing inactive City Landfill or County Landfill) to the development or exacerbation of these health conditions.

The project proponent is committed to implementing numerous mitigation measures that are designed to ensure compliance with air quality regulatory requirements. Upon project approval, project-specific monitoring activities will be performed to document the project proponent's fulfillment of these measures. Monitoring of these measures will be an ongoing process of project oversight and will continue throughout the 26-year operational site life of the proposed project.

Comment 135: Won't the operation of the landfill result in the contamination of the Los Angeles Reservoir, either from fugitive dust emissions or from scavenging (vector) birds?

Response 135: Dust migration would be controlled through a series of mitigation measures, which are listed in Response 98. The Los Angeles Reservoir is located approximately 2 miles southwest and downgradient of the project site. The reservoir is separated from the project site by elevated ridgelines, a ±100 acre open-space area, several residential developments, and other existing industrial facilities. Since the 1950s the Sunshine Canyon Landfill has operated within this area and has been contained below the existing perimeter ridgelines. The landfill has never been a documented source of water contamination. The DWP has stringent testing and monitoring procedures in place to ensure that water in the reservoir will not be affected by any potential airborne contaminants.

The primary deterrent in eliminating the potential for vectors, such as birds, is through the implementation of effective operating procedures. All waste materials brought to the site would be unloaded at the active working face of the landfill, compacted, and covered with at least 9 inches of clean soil by the end of the working day. If necessary, scavenging birds at the landfill would be discouraged by stringing wire or monofilament line above the active working face of the landfill or by other approved means (refer to Draft SEIR, Section 4.9.2, Vectors, p. 4-301).

It should also be noted that vectors, such as birds have not been a problem at the project site. Their occurrence at the project site is very rare due to existing operational practices by the project proponent.

TRANSCRIPTS OF THE PUBLIC HEARING
- Exhibit No. E-13

NOVEMBER 19, 1998 - RESPONSES
- Exhibit No. E-14

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OUR FILE NO.

16117.66366

VIA MESSENGER

R. Nicolas Brown, Hearing Examiner
 Department of City Planning
 221 South Figueroa Street, 3rd Floor
 Los Angeles, California 90012

Re: Sunshine Canyon Landfill - CPC No. 98-0184 MPR/ZC/GPA

Dear Mr. Brown:

I am writing on behalf of the applicant in the above-referenced case, Browning Ferris Industries of California, Inc. (the "Applicant"), in response to the seven questions contained in your October 23, 1998 letter and the 21 questions in your November 12, 1998 letter. As you indicated in your November 12 letter, I responded to your October 23rd letter during my oral presentation at the public hearing on October 29, and I have now placed those responses in writing below. Following those responses are our responses to your November 12th letter, some of which will be later augmented. Additionally, we intend to submit responses to written comments received by the City on or before the October 29 hearing date and testimony received at that hearing prior to the close of the hearing record on December 3; and we understand that we will be able to submit responses to any additional public comments received by the City on or before December 3 within a reasonable time thereafter.

A. Response to the October 23, 1998 Letter:

QUESTION NO. 1:

The request for a general plan amendment and zone change is ~~on~~ the entire acreage in the City. However, the application does not indicate a plan to use the 100-acre buffer area for the landfill footprint or landfill operations. Please respond to this.

RESPONSE:

The existing open space area situated south of the City Landfill, which consists of approximately 100 acres, will be maintained as open space under the proposed project. In this regard, the Applicant has decided to eliminate this 100-acre area from its request, which would mean the continuation of the existing "Open Space" designation and A1 zoning for this property. The existing uses in this open space area include a caretaker house, a cellular telephone tower and equipment shed, surface and subsurface pipelines, active and inactive oil wells, above-ground oil storage tanks, and a landfill liquid separator and sewer connection. The only regular physical activity in the area is infrequent maintenance of the cellular telephone tower and daily removal of oil from production storage tanks by an oil tanker truck. The Applicant expects no change of this activity in the future.

QUESTION NO. 2:

Why hasn't the applicant re-vegetated the inactive City landfill?

RESPONSE:

The Applicant has not fully revegetated the area of the inactive City Landfill because permanent revegetation cannot feasibly be undertaken until all responsible government agencies, including the City Local Enforcement Agency, have approved the Final Closure and Post-closure Maintenance Plan. An application for closure was filed by BFI prior to ceasing operations in September, 1991, but City litigation challenging the County's approval of landfilling within the County portion of Sunshine Canyon effectively ceased the City's processing of that plan for nearly four years. Since the settlement of that case, the City has been processing the plan.

QUESTION NO. 3:

The applicant's request is for an industrial land use designation and zone for construction, operation, maintenance, and monitoring of a landfill. Does "monitoring" consist of post-closure and closure activities? Why would an industrial designation and zone be needed during these periods or does the applicant propose self-imposing conditions that limit the type of activity normally allowed in the requested industrial designation and zone?

RESPONSE:

With regard to the zoning of the City portion of Sunshine Canyon after the City/County Landfill closes, State^{1/} and federal^{2/} regulations require the Applicant to maintain and monitor the landfill for a minimum period of 30 years after the landfill closes. Post-closure activities are industrial in nature (e.g., the maintenance and monitoring of environmental protection and control systems), and the need to protect the closed areas and the monitoring devices, as well as the associated legal liability, make most non-industrial uses of the landfill property during this period infeasible. For these reasons, an industrial designation and zone should be maintained throughout the entire post-closure period.

QUESTION NO. 4:

Explain traffic and circulation, especially regarding the potential number of trucks arriving and departing at the landfill and their route, and if they will circulate through residential streets.

RESPONSE:

With regard to traffic and circulation, the Draft SEIR and Appendix B1 summarize the trip generation forecasts for the proposed project in the City. Using the standard passenger car equivalent ("PCE") factors of 3:1 for transfer trucks and 2:1 for curbside collection trucks, the City extension project would generate a total of 2,260 PCE trips, with 245 produced during the a.m. peak hour and 285 generated during the p.m. peak hour. The approved County Landfill, which is considered a "related" project in the SEIR, would generate 3,820 daily PCE trips, with 405 trips occurring during the a.m. peak hour and 480 during the p.m. peak hour. As for residential streets located in Granada Hills, refuse collection trucks serving the adjacent Granada Hills community use those streets only during collection periods, on trash pick-up days, and Balboa Boulevard has a 6,000-pound truck restriction south of San Fernando Road.

QUESTION NO. 5:

Discuss if there are potential litter, odor and noise problems from the landfill and what measures will be taken to protect the residents from them?

^{1/} Regulations of the California Integrated Waste Management Board ("CIWMB") set forth in California Code of Regulations ("CCR") Title 27, Division 2, Chapter 3, Subchapter 5, §§ 29050 et seq., § 21180.

^{2/} 40 Code of Federal Regulations ("CFR"), Part 258, Subtitle D; Subpart F, § 258.61.

RESPONSE:

As demonstrated by the County Landfill since 1996, none of these areas of potential impact from litter, odor or noise will be significant for the joint City/County Landfill. Specifically, since the County Landfill became operational in August 1996, mitigation measures have effectively prevented fugitive litter migration off of the property. Similar mitigation measures are identified in the SEIR that would protect Granada Hills residents from these potential impacts.

As for odor, no "Notices of Violation" have ever been issued by the AQMD at either the inactive City Landfill or the currently operating County Landfill. In fact, the AQMD indicated that the inactive City Landfill was not the source of previous resident odor complaints when it was in operation during the late 1980s, and that the primary odor source was from naturally occurring sulfur and existing oil well and gas injection storage operations at Aliso and Cascade Oil Fields. Additionally, existing odor control procedures used onsite at the County Landfill are effective in controlling refuse odors.

With respect to noise, during construction, even the nearest residence (located over 1,700 feet from the closest point of construction) would be exposed to a noise level of only 54 decibels when construction is at the closest point; and, since the ambient noise level at the closest residential area is 52.4 decibels, the construction noise would not be perceptible. During operation, the proposed City/County Landfill would not create a significant noise impact on the residential area proximate to the proposed landfilling area.

QUESTION NO. 6:

The County EIR states under Section 1.4.2 (Future Uses) that the 100-acre buffer area will be retained as a buffer in its natural state. Also, the applicant states that uses of the other properties under the operator's ownership have not been defined and are not part of the proposed project. Please update the status of the planned changes of ownership in the City and County (e.g., land dedications) as well as considerations for future uses of the site after closure.

RESPONSE:

As noted in our response to your first question, the 100±acre open space area will retain its "Open Space" designation under the General Plan, as well as its current A1 zoning. As for other properties owned by the Applicant in the vicinity of the project, their status is as follows:

- Approximately 426 acres of East Canyon, which is situated immediately west of Sunshine Canyon, are being dedicated to the Santa Monica Mountains Conservancy.

- The Applicant is also conveying to the Conservancy easements for open space and recreational purposes over approximately 81 acres of the perimeter area between East Canyon and Sunshine Canyon and along the northeast perimeter of Sunshine Canyon.
- Moreover, the Applicant is currently working to acquire approximately 490 acres of Bee Canyon, situated west/southwest of the proposed City/County Landfill, for preservation as open space. This area will provide the connection between O'Melveny Park and East Canyon.

Accordingly, in total, nearly 1,100 acres in the immediate vicinity of the proposed City/County Landfill will be preserved as permanent open space through the efforts of the Applicant.

QUESTION NO. 7:

If you are not granted your request and the County allows an expansion into the upper elevations of the County landfill, how would you compare the environmental impacts of that action compared to the impacts of the proposed City landfill expansion?

RESPONSE:

As described fully in the 1993 Final EIR, the extension of landfilling into the untouched upper reaches of Sunshine Canyon would result in more significant environmental impacts than would the subject City/County proposal, which involves predominantly disturbed areas of the Canyon. It was for that very reason that the County Board of Supervisors in its final approval in November, 1993 required BFI to apply to the City for the right to return landfilling to the City portion of Sunshine Canyon. For example, relative just to biota impact, if the currently authorized County Landfill were extended farther up into the Canyon, as described in the Final EIR, the resulting 70-million ton landfill would cause the removal of an additional 3,200 oak trees and big-cone Douglas fir trees and would create other environmental impacts within the Canyon.

B. Response to the November 12, 1998 Letter:

QUESTION NO. 1: (PROJECT DESCRIPTION - 100-Acre Buffer) The general plan amendment and zone change is requested on the applicant's entire acreage in the City. However, the application does not indicate construction or operation of the proposed use in the 100-acre buffer area. It was stated in the public hearing presentation that the landfill footprint and operation will not occur in this buffer area. Please confirm this and that the area will be eliminated from your request. Also, state the specific uses and frequency of use occurring in the

buffer area, how those uses and frequency of use could change in the future, and how an A-1-O zone would affect the current and proposed use of the 100-acre buffer.

RESPONSE TO QUESTION NO. 1:

As stated at the public hearing and as indicated above in response to your first October 23 questions, the Applicant has decided to eliminate the existing 100-acre open space area situated south of the City Landfill from its request, which would mean the continuation of the existing "Open Space" designation and A1-1-O zoning for this property. The existing uses in the open space area have been legally established and with applicable City entitlements, are consistent with the A1-1-O zone. Those uses include a caretaker's house, cellular telephone tower and equipment shed, surface and subsurface pipelines, active and inactive oil wells, above-ground oil storage tanks, and a landfill liquid separator and sewer connection. The only regular physical activity in the area is the infrequent maintenance of the cellular telephone tower and the daily removal of oil from the storage tanks by an oil tanker truck.

QUESTION NO. 2: (PROJECT DESCRIPTION - New Construction) The SEIR states that existing ancillary buildings and infrastructure are already in place (i.e., utilities, access road, drainage improvements, scale house, access roadway, and administrative offices) and that the buildings will be relocated from the County active landfill to the City area. Will there be new construction thereby adding square footage to the project, and if so, what is the amount of square footage and where will it be located?

RESPONSE TO QUESTION NO. 2:

The relocation of facilities (i.e., portable trailers) currently located on County land within Sunshine Canyon and related site improvements would result in the following construction in the City (with approximate floor area of each structure): caretaker unit (1,400 sq. ft.); administration building (4,000 sq. ft.); maintenance building (1,700 sq. ft.); scale house (800 sq. ft.); leachate treatment plant (5,000 sq. ft.); environmental learning center (1,440 sq. ft.); and employee lunch room and locker facilities (1,800 sq. ft.). Related parking areas would also be developed. Figure 2.4-5 in the Draft SEIR indicates the proposed locations of these facilities. The public dropoff and the buyback area for recycling center are no longer proposed. The nursery shown on Figure 2.4-5 is currently proposed to be located in the northerly area of the City portion of the site. The existing access road in the City will be relocated as landfilling progresses within Sunshine Canyon, and it is depicted in Figure 2.5-2 of the Draft SEIR on an area of approximately 3.3 acres.

QUESTION NO. 3: (PROJECT DESCRIPTION - Hours of Operation) On page 3-99 of the FSEIR, there is discussion on reduced tipping fees for non-peak users. Please discuss what non-peak use is and how it is covered by the environmental project description, GPA/ZC application, and/or mitigation measures.

RESPONSE TO QUESTION NO. 3:

Non-peak use is the use of the landfill by waste-hauling vehicles during off-peak commuter periods. Peak commuter hours are defined in the Los Angeles County Congestion Management Program as occurring between the hours of 7:00 - 9:00 a.m. and 4:00 - 6:00 p.m. The Draft SEIR, Section 2.12, Proposed Hours of Operation, describes opening the entrance gate at 5:00 a.m. (non-peak commuter time) so that vehicles may queue on the access road and unload refuse prior to morning peak-hours. Peak-hour traffic along San Fernando Road is heavy in a southbound direction during peak morning hours and heavy in the afternoon in a northbound direction.

The Applicant will implement a peak-user surcharge during peak-traffic congestion periods, if necessary, to reduce traffic congestion. Such a surcharge would be accomplished through the following Air Quality mitigation measure:

- The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic. (*Draft SEIR, Section 4.2, Air Quality, p. 4-87*)

As stated in the Final SEIR, Table 1.10-1 (Revised), this mitigation measure would be monitored and enforced by the City's Building and Safety Department.

QUESTION NO. 4: (PROJECT DESCRIPTION - Maximum Tonnage) The proposed project is for a maximum of 12,100 tpd of landfill. Is it possible that this daily limit could be exceeded by an emergency such as an earthquake clean up operation? How might such an event effect the operation? Do you have historical examples of the effect on other landfills?

RESPONSE TO QUESTION NO. 4:

The proposed project calls for a maximum daily refuse intake rate of 12,100 tpd, with an average daily volume of 11,000 tons, based upon a total weekly refuse disposal maximum volume of 66,000 tons, and a weekly inert materials (asphalt, dirt, etc.) intake rate of 6,600 tons. In response to the January 17, 1994 Northridge Earthquake, the City's Department of Public Works developed an earthquake debris removal and demolition program. The collection of earthquake debris consisted of curbside collection of materials placed by residents and debris resulting from building demolitions. One of the main goals of the program was to conserve landfill space through debris recycling. For the overall program period (January 18, 1994 through September 19, 1995), the demolition program resulted in 33,665 tons of debris, of which 20,598 tons were disposed of in landfills (none at the inactive City Landfill, which remained

closed during the subject program) and 13,067 tons were recycled, for a 38.8% recycling rate. During the last period (February 22, 1995 through September 19, 1995), the program maintained a much higher recycling rate of 77%. The results of this program demonstrate that a high rate of demolition material is recyclable. The poor recycling rates at the beginning of the program were due to ineffective enforcement procedures which were corrected in the last stages of the program.^{3/}

Subsequent to the Northridge earthquake, an Emergency Ordinance was approved that allowed the City's Environmental Affairs Department (LEA) to contract directly with waste haulers to collect building debris through a curbside collection program rather than go through a lengthy bid process. In addition, an Emergency Waiver of Standards was enacted by the LEA to allow local landfills to apply for longer hours of operation and increase permitted daily tonnage. Therefore, it is possible that daily tonnage limit at Sunshine Canyon could be exceeded during an emergency situation.

QUESTION NO. 5: (EMERGENCY PLAN - Averting trips and discouraging illegal disposal) Is there discussion in the SEIR on what would happen if the landfill meets its daily maximum limit and how the permittee would handle averting waste trips to the landfill and discourage illegal disposal?

RESPONSE TO QUESTION NO. 5:

Inasmuch as the possibility of reaching a daily maximum is covered in the 1993 Final EIR and County CUP, it is incorporated into the SEIR. Additionally, the Applicant has procedures in place for the notification of the closure of the County Landfill if the daily limit is met, which has not occurred, and if high winds occur, which has occurred on occasion. These procedures include a one-hour notice being faxed to the primary disposal contractors, with a follow-up telephone call to each to ensure that notice to close has been received. A similar procedure would be followed at the current County Landfill and at the proposed joint facility if intake at the landfill neared the maximum daily capacity. In such cases, illegal disposal would be discouraged by providing specific notice to divert loads to various transfer facilities or other landfills. All operators have equipped their trucks with radios or beepers, and it is common practice for trucks to stop coming to the site within 15 minutes after notice is sent to operators' offices.

QUESTION NO. 6: (PROJECT DESCRIPTION - "Joint Agreement") The project description includes two statements that I question. One, "The joint operation of the City/County Landfill would allow . . . " Clarify if this reference to "joint operation" relates to the proposal for

^{3/} *City of Los Angeles Earthquake Demolition Recycling Program, Final Report,*
December 15, 1995.

joint operation of the City/County landfills through a working agreement? Second, why is it necessary to call out the volume of inert material?

RESPONSE TO QUESTION NO. 6:

The concept of "joint operation" refers to the proposed working arrangement between the City and County that would recognize and maintain discretionary approvals, permitting requirements, regulatory obligations, contractual agreements, and other arrangements needed for the joint development, construction, operation and maintenance of a landfill working face area within either jurisdiction of Sunshine Canyon, including the division of Local Enforcement Agency (LEA) responsibility and a percentage of proceeds from the disposal of waste. The potential form of agreement between the City and County has been discussed with City Planning staff, the Program Manager of the Environmental Affairs Department, the County Department of Public Works (DPW), and the County Department of Health Services (DHS). As stated, in pertinent part, in the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38:

It is anticipated that . . . both jurisdictions will execute a working arrangement, regarding the joint operation of the City/County Landfill. This arrangement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill.

That agreement would state the purposes and powers to be exercised by both jurisdictions, including, but not limited to, the following:

- ▶ combine City/County LEA monitoring and enforcement activities at the proposed City/County Landfill into a single authority;
- ▶ allow the mutual use of the access road, ancillary facilities and areas, and environmental protection and control systems;
- ▶ set reimbursement obligations;
- ▶ establish tipping fee structures; and
- ▶ establish revenue sharing by the City and County.

As for the need to call out inert materials separately, the project proposes a maximum net tonnage of refuse of 12,100 tpd (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County), with a maximum weekly refuse capacity of 66,000 tons (an average of 11,000 tpd for a 6-day week). Separately, the landfill could receive an average of

1,100 tpd (6,600 tons per week) of inert waste, which includes concrete, dirt, asphalt and the like. Some forms of inert waste (e.g., dirt, asphalt, rocks) can be reclaimed and reused onsite at the landfill. Dirt can be used for daily cover and asphalt can be used as road base during the reconstruction of the onsite access roadway. In this regard, condition 10 (j) of the County Landfill CUP requires the landfill to be operated in a manner which maximizes the amount of waste which can be placed within the approved intake volume, including, but not limited to, utilizing waste materials received and processed at the landfill as a supplement to daily, intermediate and final cover. The volume of inert materials which are used or reclaimed must be reported to the County so that AB 939 diversional credit can be obtained.

QUESTION NO. 7: (CLOSURE AND POST-CLOSURE - Inactive City and active County landfill and compatibility with the current general plan and zone classification)

Using land for a landfill consists of the following activities: construction, operation, maintenance, and monitoring. Do "maintenance and monitoring" consist of closure and post-closure activities? Why would an industrial designation and M3 zone classification be needed during these periods?

RESPONSE TO QUESTION NO. 7:

Understandably, a lot of "maintenance and monitoring" of activities occurs during the operational life of a landfill, but these terms are typically used in conjunction with closure and post-closure activities. Both state^{4/} and federal^{5/} regulations require the owner or operator of a landfill to maintain and monitor the landfill for a minimum period of 30 years after the completion of landfill closure. A Closure Plan must be approved in addition to a Post-closure Maintenance Plan. Under these plans, a landfill must be closely monitored during this period to ensure that leachate, gas, dust, drainage and erosion controls are sufficiently maintained and that other performance standards incorporated into landfill design are being met to satisfy public health and safety requirements. An emergency response plan and site security measures are required, and any post-closure land use or construction must be approved by various State and local regulatory agencies. The industrial nature of closure and post-closure activities, the paramount need to protect human health and the environment during these periods, and the legal liability associated with such activities make most non-industrial uses of the landfill property infeasible during the closure and post-closure periods; hence, the need for the continued industrial designation and M3 zoning.

^{4/} Regulations of the California Integrated Waste Management Board ("CIWMB") set forth in California Code of Regulations ("CCR") Title 27, Division 2, Chapter 3, Subchapter 5, §§ 20950 et seq., § 21180

^{5/} 40 Code of Federal Regulations ("CFR"), Part 258, Subtitle D: Subpart F, § 258.61

QUESTION NO. 8: (CLOSURE AND POST-CLOSURE - Need for M3 zone classification for proposed project) The applicant's request is for an industrial land use designation and M3 zone for the construction, operation, maintenance, and monitoring of a landfill. Concern was presented at the public hearing that in granting the request it would allow incompatible industrial land uses to occur after capacity is reached in the landfill. Do "maintenance and monitoring" consist of closure and post-closure activities? Why would an industrial designation and M3 zone classification be needed during these periods? Does the applicant propose self-imposing conditions that would apply after capacity is reached in the landfill to limit the potential for incompatible industrial uses?

RESPONSE TO QUESTION NO. 8:

As noted in response No. 7, maintenance and monitoring activities during the closure and post-closure periods are industrial in nature, with associated legal requirements and liability, justifying an industrial designation and corresponding zone throughout the entire closure/post-closure process. Limiting conditions imposed at the time of General Plan Amendment/zone change approval could prohibit non-landfill-related, industrial uses and activities on the property, including manufacturing plants that produce chemicals, acetylene, gas, chlorine gas, disinfectants, pesticides, paint, plastics, petroleum products and glass; and industrial uses such as bronze casting, automotive dismantling, canneries, foundries, grain fermenting, and lumber yards. As noted above, when the landfill stops accepting waste, State regulations limit the uses that will be permitted. However, beneficial landfill uses which utilize byproducts from the natural decomposition of waste in the landfill would not and should not be prohibited. Such beneficial uses could include the productive use of landfill gas as fuel or the conversion of such gas into energy. Currently, such gas is flared at the County Landfill.

QUESTION NO. 9: (SEIR STATEMENT OF OVERRIDING CONSIDERATION)

On page 1-11 of the DSEIR, it is noted that the proposed project would result in undesirable impacts that cannot be alleviated even with a reduced volume capacity or other design. Is the mention of "a reduced volume capacity" the alternative in the SEIR? Also, at what capacity would the proposed project not result in significant environmental impacts in air quality? Please elaborate on each of the listed six reasons and include references to supporting documentation and citations in the SEIR.

RESPONSE TO QUESTION NO. 9:

A Reduced Volume Alternative is summarized in Section 1.9.4 and is fully analyzed in Section 5.5 of the Draft SEIR. However, it should be noted that there would be significant air quality impacts even if the capacity of the landfill were reduced below the ±60-acre, 8.4-million ton Reduced Volume Alternative analyzed, and this alternative would only provide less than three years of additional disposal capacity. Once this capacity is reached, an increase in regional air quality impacts would result due to greater travel distances to other landfill facilities located

farther away within the County and out-of-County, since the remaining permitted landfill capacity in the County is projected to be exhausted in less than nine years under current conditions. (See Draft SEIR, Sections 2.3.2 and 2.3.3.) This greater transportation distance to these remote landfills would result in the generation of greater mobile emissions. The six reasons for proposing implementation of the project despite its unavoidable impacts were listed in the Draft SEIR, p. 1-11, and they are elaborated on below:

1. Ensure sufficient in-County waste disposal capacity for the City and County.

Table 2.3-1 (Revised) Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in the County of Los Angeles (See Final SEIR, pp. 2-7 through 2-9), indicates that three landfills have recently closed and four of the seven remaining Class III landfills in Los Angeles County are expected to close or reach capacity within the next 10 years. Based on the 1995 average disposal rate, remaining capacity is projected to be exhausted in less than nine years. References to support these projections are based on the *Los Angeles Countywide Siting Element, Volume I: The Element* (Los Angeles County Department of Public Works, Environmental Programs Division, June 1997) and *Preliminary Draft Los Angeles County Countywide Siting Element* (Los Angeles County Department of Public Works, Environmental Programs Division, January 1996) and presented in the Draft SEIR, pp. 2-5 through 2-10. Refer also to the Final SEIR, Response 943. Given existing capacity limitations and the lack of new approved landfills, the City and County waste stream will need to be disposed of either out-of-County or out-of-State.

2. Comply with the mandated requirements of A.B. 939 (i.e., provide a minimum 15 years of disposal capacity to these jurisdictions).

AB 939 requires cities and counties to plan for future needed disposal capacity, in addition to implementing source reduction and recycling programs. The largest city in Los Angeles County cannot shirk this responsibility. The Draft SEIR, Appendix C13, Regulatory Overview of State-, County-, and City-Enacted Waste Management Acts, provides background information on AB 939 and how the mandates of this statute are implemented by the *Countywide Siting Element* (CSE), the *County Source Reduction and Recycling Element* (SRRE), and the City SRRE. The proposed project's compliance with these and other solid waste management plans (i.e., *Solid Waste Management and Disposal Options in Los Angeles County* (Options Report), *Los Angeles County Solid Waste Management Action Plan* (County Action Plan), *City of Los Angeles Solid Waste Management Action Plan* (City Action Plan), *City of Los Angeles Solid Waste Management Plan* (CiSWMP), *City of Los Angeles Solid Waste Management Policy Plan* (CiSWMPP), *Integrated Solid Waste Management System for Los Angeles County*, and

Los Angeles County Countywide Integrated Waste Management Plan) is discussed in the Draft SEIR, Section 4.7.3, Solid Waste Management Plans, pp. 4-273 through 4-279. Refer also to the Final SEIR, Responses 895 and 942.

3. Provide a landfill proximate to City-and County-generated waste streams.

The City's October 1993 *Phase IV Report, Solid Waste Management Policy Plan* contains Objective 3.3, regarding Disposal Facilities (see page 6-7), which calls for the City to:

. . . identify, evaluate, and secure by the year 2000 adequate disposal capacity to accommodate projected waste requiring disposal to the year 2020 with an optional reserve capacity in the year 2020 for 20 years of additional disposal.

To achieve this objective, the Plan presents three policies to secure adequate disposal capacity: Local Disposal, Remote Disposal, and Other Disposal Methods. The Remote Disposal policy calls for the transportation of City waste, either by rail or truck, to remote locations in Riverside, San Bernardino and Imperial counties, provided such disposal is environmentally safe, technically feasible, and publicly acceptable. The policy for pursuing Other Disposal Methods states that although several have been evaluated, none appears feasible due to implementation, environmental or financial issues. The remaining policy for achieving the Plan's objective, the policy for Local Disposal, which contemplates siting a landfill close to City-and County-generated waste streams, calls for the City to work closely with the County, other jurisdictions and private firms to identify and secure additional disposal capacity in and/or outside the County to meet the City's needs.

The Local Disposal policy recognizes that even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated in the City. Recognizing that the siting of landfills is extremely difficult, the policy also provides that the City will look to the expansion of existing landfills, in addition to working with the County to jointly develop landfill capacity, and specifically mentions the expansion of Sunshine Canyon.

The identification of the expansion of Sunshine Canyon to meet local need is also stated in the Options Report, County Action Plan, CiSWMP, Integrated Solid Waste Management System Draft Program EIR, County SRRE, and CSE. (Refer to the Draft SEIR, Section 4.7.3, Solid Waste Management Plans, pp. 4-273 through 4-281.)

The following solid waste objectives can be achieved by providing sufficient landfill capacity at Sunshine Canyon:

- ▶ provide efficient solid waste management and disposal capacity to the City and County by developing a landfill facility to avert an identified short-term and potential future long-term solid waste disposal capacity shortfall;
 - ▶ provide both City and County jurisdictions the opportunity for long-term solid waste disposal capacity;
 - ▶ minimize impacts on air quality within the South Coast Air Basin (SCAB) by providing additional disposal capacity within the Los Angeles region, thereby reducing emissions from transporting refuse longer distances;
 - ▶ provide cost-effective disposal options for the City, County and private haulers at a landfill facility within the region to minimize transportation costs; and
 - ▶ facilitate local and regional efforts directed toward attaining solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the *City of Los Angeles Source Reduction and Recycling Element* (City SRRE), the *City of Los Angeles Solid Waste Management Policy Plan* (CiSWMPP), the County and City Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, the *Los Angeles County Countywide Siting Element* (CSE), the *County of Los Angeles Source Reduction and Recycling Element* (County SRRE), and formally executed agreements between the County and the City that identify the need for the maximum technically and environmentally feasible expansion of landfill sites.
4. **Minimize significant environmental impacts that would occur elsewhere as a result of developing new landfill sites or imposing longer transportation distances to remote facilities.**

The Draft SEIR, Section 5.0, Alternatives, includes a discussion of potential/proposed landfill sites in Los Angeles and Riverside counties and remote landfill facilities either in-State or out-of-State. A summary matrix in Table 5.3-1 presents a comparative assessment of these alternatives by topical issue.

Potential/proposed landfill sites and landfill expansions evaluated in the Draft SEIR were Elsmere Canyon, Blind Canyon and El Sobrante. The development of Elsmere Canyon

was determined to have potentially greater environmental impacts on earth resources, air quality, biological resources, light and glare, land use, transportation, recreation, and aesthetic/views than the proposed project. (See Draft SEIR, Section 5.7.1, p. 5-27.) The development of Blind Canyon would result in potentially greater impacts on earth resources, air quality, surface water, biological resources, parks, water supply, aesthetics, and paleontological resources than the proposed project. (See Draft SEIR, Section 5.7.2, pp. 5-28 and 5-31.) The expansion of El Sobrante would potentially result in greater impacts on earth resources, air quality, surface water, biological resources, light and glare, transportation (due to greater hauling distance to western Riverside County), aesthetics, and archaeological resources than the proposed project. (See Draft SEIR, Section 5.8.1, pp. 5-32 and 5-35.)

Remote landfill facilities analyzed in the Draft SEIR were Eagle Mountain, Railcycle-Bolo Station, Mesquite Regional, and La Paz. The development of Eagle Mountain landfill would result in potentially greater impacts on earth resources, air quality, surface water, water quality, water supply, biological resources, noise, light and glare, natural resources, risk-of-upset, transportation, fire protection, and parks than the proposed project. (See Draft SEIR, Section 5.10.1, pp. 5-52 through 5-54.) The development of Railcycle-Bolo Station Landfill would potentially result in the following impacts that would be greater than the proposed project: earth resources, air quality, water supply, biological resources, light and glare, natural resources, risk-of-upset, transportation, fire and police protection, aesthetics, and paleontological resources. (See Draft SEIR, Section 5.10.2, pp. 5-57 and 5-58.) The development of Mesquite Regional Landfill would result in potentially greater impacts on earth resources, air quality, groundwater, biological resources, noise, light and glare, natural resources, risk-of-upset, transportation, aesthetic, and cultural resources than the proposed project. (See Draft SEIR, Section 5.10.3, pp. 5-60, 5-63, and 5-64.) Refer also to the Final SEIR, Responses 124, 893, 905, and 908.

5. Use land within both jurisdictions that has been disturbed by previous landfill activities.

The Draft SEIR, Section 1.5.2, pp. 1-5 and 1-6, presents a summary of previous landfilling activities that have occurred within the City portion of Sunshine Canyon from 1958 until the expiration of its zoning variance on September 21, 1991. The acreage within the City portion of Sunshine Canyon that has been disturbed from this prior use is summarized in Table 2.4-1 and includes approximately 205 acres for the two fill areas, 12.5 acres for the access road, and 116.50 acres also associated with prior landfilling activities including the ancillary facility pads and nursery areas. Development of the proposed project would encompass ± 80 acres of the existing inactive City Landfill.

Within the County portion of Sunshine Canyon, approximately 215 acres have been approved for the landfill footprint, and landfill activities are currently taking place within this area (since August 19, 1996). This footprint would connect with an additional 42 acres within the County proposed as part of this project. (See Draft SEIR, Table 2.5-1 and p. 2-26.) Currently this area is disturbed and developed with ancillary facilities such as environmental protection and control systems.

As stated in the Draft SEIR, Section 2.5.3, p. 2-37, the proposed City/County Landfill would use existing ancillary facilities (i.e., scale house, administrative offices, and access road) and certain environmental protection and control systems (i.e., leachate storage and control center, drainage systems, and water storage tank) that are currently being used for the operational County Landfill.

Approval of the City/County Landfill would accommodate City-generated wastes and provide for the development of additional disposal capacity in a canyon area that has been disturbed by 40 years of prior landfilling activities, thus avoiding the need for landfilling in natural, undisturbed areas. The adjoining County Landfill site, which is an active industrial use, has a projected site life of approximately eight more years and the potential to increase that capacity based on its CUP. The proximity of these uses to the Project site renders it unsuitable for other uses and further reduces its viability as open space unrelated to public health and safety.

6. Provide a landfill facility within both jurisdictions and maintain local control over that facility.

By the year 2000, no public or private landfills will be operating within the City (with the possible exception of the Bradley Landfill for 2-3 years); and by 2006, four of the remaining Class III landfills in the Los Angeles region are expected to close or reach capacity. The City faces a shortfall in disposal capacity which must be addressed. Sunshine Canyon is ideally suited to provide that capacity, given its isolation from other uses, its proximity to the County Landfill, its history of prior use, and the buffering that surrounding ridges and open space will provide. It is anticipated that prior to or concurrent with City/County Landfill Project approval by the City, both jurisdictions will execute a working arrangement regarding the joint operation of the City/County Landfill. As noted above, this arrangement would recognize discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill, as well as new entitlements provided by the City and County. As stated in the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38, that agreement would cover at least the following:

- ▶ combine City/County LEA monitoring and enforcement activities at the proposed City/County Landfill into a single authority;
- ▶ allow the mutual use of the access road, ancillary facilities and areas, and environmental protection and control systems;
- ▶ set reimbursement obligations;
- ▶ establish tipping fee structures; and
- ▶ establish revenue sharing by the City and County.

These features of local control and jurisdiction would not be available if the City is forced to seek its needed landfill capacity in remote, out-of-County facilities.

QUESTION NO. 10: (WORKING AGREEMENT) Has there been an analysis of what is required to merge the joint administration of the landfill (i.e., Working Arrangement/form of agreement between the City and County regarding the joint development, operation, maintenance of the ultimate landfill)? Is it anticipated that the County Department of Health or the City's Environmental Affairs Department will be the LEA or both?

RESPONSE TO QUESTION NO. 10:

The working agreement could take the form of a standard State-authorized development agreement that BFI would enter into with both the City and the County. Issues to be covered in such an agreement would include, in addition to the vesting of each jurisdiction's approved entitlements for the landfill, the imposition of tipping fees, means of dividing the tipping fee revenue between the jurisdictions and the various operational responsibilities detailed above. With respect to the revenue to be received by the respective jurisdictions. Currently, condition 14 of the County Landfill CUP provides for the permittee to pay to the County a fee equal to ten percent of the sum of the following:

- The net tipping fees collected at the landfill, (including any fees received as a part of a materials recovery program), the net tipping fee being the total collected less any other fees or taxes imposed by any federal, state or local agency and included in the fee charged at the landfill entrance;
- Gas-to-energy or direct gas sale revenues, less any federal, state, or local fees or taxes included in such revenues.

This condition provides a credit mechanism if the County imposes a business tax on landfill revenues, and specifies that if at any time during the life of the CUP the permittee is operating the landfill within both unincorporated and City territory, then the required fee would be reduced in proportion to the relative amounts of waste placed or processed and the gas produced and used or sold in the two jurisdictions.

In the case of the proposed City/County Landfill, assuming the City were to impose a similar 10% tipping fee, an allocation of the 10% tipping fee could be made based on the percentage of remaining capacity within the City and County portions of the landfill footprint area, and the fee could be collected and divided between the City and County pursuant to such allocation. The division of the fee revenue would be made regardless of where the waste is actually disposed of within the landfill footprint. The agreement could also provide for an audit every year.

With respect to the LEA, it seems advisable that one jurisdiction take the lead in overseeing operational activities at the landfill, in order to avoid duplication of work and effort and ensure efficient administration; but the selection of the lead jurisdiction has not yet occurred.

QUESTION NO. 11: (DISTANCE FROM LESS INTENSE ZONING) The SEIR states that the closest residential [unit] is 1,700 feet from the landfill footprint (with the exception of six trailers that are located immediately east of the landfill entrance across San Fernando Road at approximately 700 feet). However, the radius map shows what appears to be a land locked subdivision zoned A1-1 located northeast of the landfill. Has research been done on the ownership and potential development of the parcels?

RESPONSE TO QUESTION NO. 11:

Chicago Title has completed some preliminary research regarding the approximately 5-acre remnant portion of Tract 9673, located northeast of the City/County landfill and zoned A1-1. The tract map for Tract 9673 was recorded in 1927. It appears that all of the lots in the tract were acquired by the State of California (by deeds and/or final orders of condemnation) some time in the 1960s for construction of the Golden State Freeway. The latest AP map available (AP Book 2601, page 4 - see copy attached) shows that the Golden State I-5 Freeway completely enveloped the tract (or what remains of it) with all parcels tied together. In 1983, a Director's Deed from Caltrans was recorded indicating that the property was excess land and landlocked (see copy attached). This Deed recites the following on page 3:

There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway. The above-described real property is landlocked and without any direct access to the freeway or to any public or private road.

The State of California is without obligation or liability to provide access to the said real property.

According to Chicago Title, the property appears never to have been insured by a title company. Based on the amount of documentary transfer tax paid in 1983, the consideration paid for this parcel is estimated at approximately \$11,000.

Given the landlocked nature of this remnant parcel, it no longer meets the definition of a lot under the Los Angeles Municipal Code. This property has remained vacant and unused since 1927 and cannot be developed. It was purchased with full knowledge of its lack of access. To avoid creating a small island of A1-zoned property, one of the most restrictive zones, which is surrounded by industrial uses and M3 and PF zoned property, the least restrictive zones, the City should re-zone this property to [Q]M3, as an "added area," in the pending zone change proceedings, with uses restricted to those permitted in adjoining property and with all other uses subject to review and approval by a zoning administrator, in order to avoid creating a spot zoning situation.

QUESTION NO. 12: (MITIGATION FOR BLASTING) There is discussion of blasting in the SEIR (Refer to FSEIR pg. 3-57). What are the mitigation measures for this noise impact?

RESPONSE TO QUESTION NO. 12:

It is not reasonably foreseeable that blasting would be used as part of the proposed City/County Landfill, although methods of excavating earthen materials can vary with encountered field conditions. As stated in the Draft SEIR, Section 2.6.3, City/County Landfill Design, p. 2-50, various excavation methods would be used to achieve foundation base-grade elevations. The specific methods would be a function of the soil type encountered or bedrock material expected to be excavated. Conventional construction equipment, such as an excavator, wheeled loaders, dozers, and scrapers, would be utilized. The project site would be excavated within the limit lines and base of excavation contours of the proposed City/County Landfill footprint to obtain materials for a proper foundation for the landfill liner. However, if blasting is used due to the unforeseen conditions of extremely hard rock, appropriate permits will be obtained from City departments and charge densities would be selected so that resulting noise levels from blasting would not exceed 70dB.

QUESTION NO. 13: (MODIFICATION OF PROJECT) The learning center and green waste/wood waste recycling buildings are located in what appears to be the 500-foot inner M3 buffer. The recycling use is an M3 use which should be located out of the inner M3 buffer. Please clarify the proposed location of the recycling building and use.

RESPONSE TO QUESTION NO. 13:

Contrary to the preliminary indication in the Draft SEIR, the Applicant is no longer proposing a fixed site on the southern portion of the City Landfill for wood waste/green waste recycling activities. In fact, because the facilities required for such recycling are very mobile, the green waste and wood waste equipment can be located at a number of areas in the landfill footprint that are easily accessible to waste hauling trucks. Accordingly, no recycling operations will be located outside of the M3 zone.

QUESTION NO. 14: (MODIFICATION OF PROJECT - Final elevation and effects of the wind) At what elevation and final fill location would there be the reduction or elimination of wind blown litter and dust into the residential community to the south?

RESPONSE TO QUESTION NO. 14:

The final fill elevation is not a parameter in addressing the reduction or elimination of wind blown litter and dust into the residential community to the south. Mitigation measures relating to wind and litter are addressed in Topical Response 3 in the Final SEIR, and include measures such as the addition of soil sealant, active watering of stockpiles and the working face, and wind monitoring to mitigate the potential for the possibility of wind blown litter and dust to occur at any fill elevation. Additionally, Topical Response 18 discusses the mitigation measures:

Because the project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions could potentially transport litter offsite. The strongest winds generated within this area are during short-term episodes of Santa Ana wind conditions. During high wind conditions, the project site manager will designate confined and shielded portions of the landfill for disposal.

Currently, for the operational County Landfill, the project proponent uses an extensive litter control program with specific preventive and response measures to control windblown litter and debris onsite and, if necessary, within the vicinity of the landfill site. These measures include placing waste materials within confined working face areas, sheltered from direct wind gusts during Santa Ana conditions, using proper compaction techniques and daily cover material, and using portable litter fences adjacent to the daily operating area with a portable trailer vacuum system. In addition, the project proponent provides weekly cleanup within the adjacent community and along San Fernando Road and its frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard. In addition, and on a daily basis, landfill employees inspect the areas immediately adjacent to the landfill site to pick up litter, if necessary. Enforcement of litter control practices at the operational County Landfill is under the authority of the County of Los Angeles, Department of Health Services (County LEA).

Vehicles transporting waste loads to the project site that are not covered, as required by law, are also a contributor of onsite litter at the project site and within the general vicinity of the project area. Currently, haulers with uncovered waste loads are informed at the scale house area that all future waste loads must be tarped and covered. If a specific refuse hauler continues to bring solid waste to the project site in vehicles that are not fully covered, the project proponent has the option to refuse delivery of the load and will impose fines and/or surcharges upon the violating waste-hauling company.

Drivers of waste-hauling vehicles who violate the mandated tarping requirement are given a notice by the project proponent that states the following requirement:

TARPING VEHICLE CODE REQUIREMENT: The following tarping vehicle code will be enforced at the Sunshine Canyon Landfill. First offenders will be warned a second time, and multiple offenders will be fined \$100.00 per offense.

Additionally, in accordance with the California Vehicle Code (CVC), §23114(a), no vehicle shall be driven or moved on any highway unless the vehicle is constructed, covered, or loaded to prevent any of its contents from dropping, shifting, leaking, blowing, spilling, or otherwise escaping from the vehicle. In addition, CVC §23115 states that no vehicle loaded with garbage, swill, cans, bottles, wastepapers, ashes, refuse, trash, or rubbish; or any noisome, nauseous, or offensive matter; or anything transported to a dump site for disposal shall be driven or moved upon any highway unless the load is totally covered in a manner that will prevent any part of the load from spilling from the vehicle. Large-volume customers currently comply with these requirements at the operating County Landfill. If these large-volume customers do not comply, there is a mechanism (via their existing contract) to enforce a fine(s). Also, the project proponent is presently working with the County LEA to encourage small-volume haulers to use proper tarping.

Moreover, because the majority of the waste disposal at the current landfill is under contracts with hauling companies that haul refuse in covered or enclosed containers, and such requirements are enforced under such contracts, litter has not been a problem at the County Landfill.

The proposed City/County Landfill will incorporate litter control measures similar to those described above for the operational County Landfill. The potential for litter migration into adjacent residential and park areas within Granada Hills is very unlikely due to proposed operating procedures and mitigation. With the incorporation of the

mitigation measures for litter identified in the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306, no significant impacts would occur.

QUESTION NO. 15: (TRANSFER STATIONS) In the current proposal, approximately 46 percent of the fill will originate from transfer stations. Who owns and controls these stations? Is there the potential that the 46 percent amount could change? What would be the effect of such change? Would the change require additional employees, new industrial activities, or new buildings on-site to compensate for the reduced number of transfer stations?

RESPONSE TO QUESTION NO. 15:

BFI currently owns and operates a number of transfer stations materials recovery facilities (MRFs) in the Southern California area. The transfer station/MRF sites owned by BFI and other waste handling companies are located closer to major urban centers, where refuse is collected and transported to these facilities by smaller collection vehicles, and refuse is subsequently transported via larger transfer trucks to landfill facilities such as Sunshine Canyon. It is likely that at some point in the 26-year life span of the proposed project that the percentage of waste originating from transfer stations will fluctuate. However, it is speculative at this point to make a determination of when and if these fluctuations might take place. In any event, any changes that take place in this regard would only affect the mix of vehicles arriving at the landfill (i.e., transfer trucks vs. curbside collection trucks) and not the overall volume of waste arriving at the landfill. If any change would occur in the future, it would be to have more transfer trucks arrive at the landfill. If a reduction in transfer stations did occur, it would not result in an need for new employees, industrial activities or buildings.

QUESTION NO. 16: (REALIGNMENT OF ROAD AND ITS VISIBILITY) Where in the SEIR does it discuss the visibility of the realigned road? Will it be visible from off-site locations?

RESPONSE TO QUESTION NO. 16:

The realignment of the internal access roadway and haul road is discussed in section 2.10.1 (Project Description) of the Draft SEIR. As the landfill footprint progresses in its development downward toward the landfill entrance in Sunshine Canyon, this roadway would be shortened and realigned as necessary due to the sequenced development of new landfilling areas within the established footprint. The final realignment of this roadway, its width, and length are illustrated on Figure 2.5-1. The existing access roadway will be used until realignment of the roadway is necessitated to accommodate the development of landfilling areas within the project site. Section 4.18, Aesthetics/Views, discusses offsite views of the project site. This section discusses the fact that the surrounding topography outside of Sunshine Canyon is dominated by mountainous ridgelines that obstruct and/or limit views into the interior canyon from most adjacent properties and uses. Offsite viewshed areas are limited to those locations where

elevations exceed perimeter ridges or locations southeast of the site that have a limited view into the interior of the Sunshine Canyon. Views of the site from residential areas to the south and southwest would be blocked by ridgelines. Brief glimpses of the site to passing motorists would be visible from the I-5, SR-14 and other adjacent roadways, which is not considered a significant negative visual impact due to the short duration of exposure and given the visual dominance of other features in the area (i.e., industrial, residential, hillside terrain).

QUESTION NO. 17-A: (EARTHQUAKE) Concern was raised at the public hearing regarding earthquakes and the ability of the proposed liner to withstand a greater than 5'3" displacement and a .20g force. The SEIR provided very comprehensive discussions on the matter. However, we encourage your office to consider the speaker's recommendation to obtain a review of the SEIR conclusions by Cal Tech in Pasadena or the Earthquake Center at USC.

RESPONSE TO QUESTION NO. 17-A:

The suggestion that the liner system was designed to only withstand a 5.3-inch displacement and a 0.20 g force is not correct. The landfill has been designed to withstand a peak ground acceleration of greater than 1.0 g, as discussed on page 15 of Appendix C15 of the draft SEIR. For the Sunshine Canyon County Extension Landfill, the calculated permanent movement of the waste mass relative to the liner system in this 1.0+g earthquake is 5.3 inches (Table 5-5, referenced on page 39 of Appendix C15). This relative movement is a result of the earthquake ground vibrations (strong shaking) and is different from the tectonic movement of the ground beneath the landfill in the earthquake. This calculated relative movement of 5.3 inches is less than the maximum value considered acceptable by the Regional Water Quality Control Board (RWQCB), the Department of Water Resources, and the landfill engineering community.

Testimony at the public hearing confused this relative displacement between the waste mass and liner system with the tectonic displacement experienced by the ground in an earthquake. The earthquake displacements that occurred in the region following the San Fernando and Northridge earthquakes were regional tectonic displacements. The landfill can withstand regional tectonic displacements in excess of ten feet, as regional tectonic displacements do not put any stress on the liner system.

The design ground motions were developed based upon the most recent information on regional seismicity from the USC Earthquake Center (SCEC). It is the responsibility of RWQCB, as lead agency for the liner design, to review and approve the design. The ground motions were subject to intense scrutiny in the RWQCB hearings for the County Landfill. At those hearings, Dr. Norman Abramson, an SCEC principal investigator hired by the North Valley Coalition, testified that he had reviewed the design ground motions for the landfill and had found them to be appropriate. The RWQCB uses the State Department of Water Resources as an expert for earthquake design. The design ground motions were also reviewed and approved by

earthquake experts from the California Department of Water Resources, Division of Dams and Embankments.

QUESTION NO. 17-B: (AIR QUALITY) Concern was raised at the public hearing regarding air quality by the Los Angeles Unified School District. The quantitative analysis on the probability of the health effects of the landfill operational mobile sources highlighted the issue of exceeding toxic and criteria pollutants. The testimony also contradicts the conclusions reached in the SEIR. Please address the testimony and provide additional supporting documentation for your methodology and conclusions.

RESPONSE TO QUESTION NO. 17-B:

The Applicant is preparing a detailed response to the lengthy comments of the LAUSD regarding air quality, which will be submitted within the next few days.

QUESTION NO. 18: (GROUNDWATER) Concern was raised at the public hearing regarding the possibility of contamination of the City's water supply by migrating leachate from the landfill. The testimony also contradicts the conclusions reached in the SEIR. Please address the testimony presented and provide additional supporting documentation for your methodology and conclusions.

RESPONSE TO QUESTION NO. 18:

The SEIR concluded that no significant impacts to beneficial uses of groundwater of the San Fernando Groundwater Basin would occur as a result of the development of the proposed City/County Landfill. To address potential environmental impacts resulting from leachate formation, the proposed City/County Landfill is mandated by State and federal laws to install a leachate collection and removal system (LCRS). The LCRS will be installed on top of the liner system in all areas of the proposed landfill footprint including side slope and waste-on-waste areas of the existing inactive City Landfill. This system will be constructed, maintained and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS will be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. A description of the components of the leachate treatment system is provided in the Draft SEIR, Section 2.7.4, Leachate Collection and Removal System, p. 2-61

In addition to the LCRS, operational practices will be performed by the Applicant to minimize leachate generation. These include diverting stormwater runoff around the landfill, diverting surface water runoff away from active landfilling areas, minimizing the size of the landfill working face area, grading the landfill surface to provide positive surface water drainage away from active landfill areas, and applying daily, intermediate, and final cover material to

minimize moisture infiltration into the waste mass. Additionally, the proposed City/County Landfill will not accept liquid wastes or wastes with high-moisture content.

It is anticipated that the design and operational characteristics of the proposed landfill, the installation of numerous environmental protection and control systems, and the continuous monitoring during landfilling operations and the closure and post-closure maintenance period will ensure the integrity of groundwater resources within Sunshine Canyon. It is not expected that groundwater resources would be impacted by the proposed project development.

As discussed in Section 4.3.2 Groundwater, of the Draft SEIR, with regard to potential offsite migration of leachate, consulting geologists have made a determination based on published literature, field hydrogeology tests, geologic mapping and water quality data, that landfilling within Sunshine Canyon would not create a significant impact on beneficial groundwaters of the San Fernando Valley Groundwater Basin.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to Waste Discharge Requirements (WDRs), liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

The proposed City/County Landfill would not impact any imported drinking water or domestically produced drinking water (e.g., from local area wells). In this regard, it should be noted that there would be no impacts on the nearest spreading ground (Hansen Spreading Ground), which is located approximately 5 miles southeast of the project site. In addition, surface water runoff from the project site is safely conveyed into the City's flood control system, which connects with the County's flood control system.

Additional information regarding leachate migration from the landfill can be found in Topical Responses 6 and 7 in the Final SEIR. In addition to the engineering controls described above, the geologic setting of the landfill isolates it from drinking water aquifers. As discussed in the SEIR, the only hydraulic connection between the landfill site and drinking water supplies is the relatively narrow and shallow layers of alluvium along the stream channel in the axis of the canyon. This alluvium will be removed beneath the footprint of the landfill during construction, as discussed in the SEIR. The natural geologic setting has contributed significantly to the fact that landfilling activity in the canyon over the past 30+ years has not impacted drinking water supplies.

QUESTION NO. 19: (HEALTH STUDY) Concern was raised at the public hearing regarding the need for a health study. In Section 4.9.5 of the DSEIR, it is stated that "the proposed project could potentially create a significant human health impact if the proposed landfill operation were to create carcinogenic risks or other related human health impacts to surrounding area residents. Results from the proposed project's low-level air quality health risk assessment indicate that no significant impacts would be anticipated." In light of the public hearing testimony, has any new information been presented that suggest a health study is warranted?

RESPONSE TO QUESTION NO. 19:

No new information has been presented that would warrant an additional health study. Prior to preparation of the Draft SEIR, comments were received from individuals during the NOP process that pertained to potential human health impacts (e.g., incidence of cancer, respiratory ailments and diseases, allergies, skin disorders, and airborne toxins). Most of the concerns were raised by individuals who resided in the Granada Hills area. In response to these concerns, City Planning staff initiated investigations and had several meetings with leading medical authorities, such as Paul J. Papanek, M.D., M.P.H. (Chief, Toxics Epidemiology Program, Disease Control Programs of the County of Los Angeles, Department of Health Services) and Thomas M. Mack, M.D., M.P.H. (Professor of Preventive Medicine, University of Southern California, School of Medicine). Based on the review of existing information and the advice of these experts, City Planning staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.

It should be noted that Dr. Papanek indicated the potential for significant human health risk impacts to be statistically attributable to a Class III landfill is generally low. His comments were based on his extensive review of published scientific studies of landfill sites located throughout California. Dr. Mack, who has designed, researched, and prepared a number of epidemiological studies for hazardous Class I waste landfills, indicated it would be unlikely that an epidemiological study for the proposed project would produce a definitive finding linking health problems of area residents to the landfill site. In summary, based on the results of this information and analysis, the proposed project will not have a significant effect on human health in the area of the project.

In addition, and as discussed in the Draft SEIR, Section 4.2.9, Health Risk Analysis, p. 4-76, the use of SCREEN2 as a screening level assessment for CEQA purposes was established in a modeling protocol received and reviewed by SCAQMD staff. The protocol specified use of SCREEN2 for the initial assessment. If the results did not establish a less than significant impact with an adequate margin of safety, then BEEST-X, a hybrid combination of ISCST2 and COMPLEX 1, was to be used. This protocol was followed in the Draft SEIR. SCREEN2 model

input/output assumptions and derivations were presented in detail in the Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, and include the computer output sheets with all specified input parameters. The SCREEN2 analysis shows that toxic emissions are below the SCAQMD significance threshold of one in 1 million for cumulative maximum individual cancer risk.

The City's Zoning Administrator originally determined in September 1988 that a health study was desirable because information in the record pertaining to this issue was not adequate to prove adverse health affects. Specifically, the Zoning Administrator stated:

Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contained no scientific or expert documentation relating to this.

With respect to the "informal health survey" sent by landfill opponents to area residents in 1988, the Zoning Administrator stated in his findings (September 1988) regarding Case No. ZA 17804 (RV):

Health Impacts - This major allegation remains unproven. The health survey mailed to 5,000 residents was not scientific in its consideration. It would have been virtually impossible to answer it, absent perfect health, without appearing to indict the landfill for problems of allergies, respiratory ailments, skin diseases, etc. The questions and answers are not statistically valid, due to their construction. It would also have been helpful to have had expert (medical) input. A major question which the Administrator has is: Are the rates of allergy, respiratory illness, etc., abnormal for this area, in consideration of the frequently high winds blowing from the north and the proximity of a northerly hinderland with substantial natural vegetation? Under those conditions, a prevalence of allergies (particularly in the Spring) would not be surprising.

It should also be noted that in response to his request, the Applicant submitted a proposal to the City Zoning Administrator for the purpose of conducting a health study. Lengthy discussions with the City ensued regarding revisions to the proposal, and modifications to the proposal were submitted. However, the City Zoning Administrator, possibly because of later statements by qualified epidemiologists regarding the absence of a significant health risk and the problematic nature of any "health study" in the subject neighborhood, did not act on that proposal.

QUESTION NO. 20: (ADDITIONAL OPEN SPACE) Concern was raised in written comments from the public hearing regarding the inadequacy of open space surrounding the site. Please review and respond to the following potential mitigation measures:

Acquire and transfer ownership to a public park agency or a nature conservancy land, the located at the northern end of the Weldon Canyon Motorway at its junction with Coltrane Street. (This would provide public access to the Weldon Canyon Motorway by way of trail to connect with other access routes provided through the County conditional use grant.)

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at Mission Point that includes the peak west of and 1/3 of a mile from O'Melveny Park. (This would provide public access to an area that has been very popular for decades with hikers, bicyclists, equestrians, and nature lovers.)

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at the headwater area of Rice Canyon Creek. (This is to further the development of Santa Clarita Woodlands Park as part of a similar effort in the County conditional use grant.)

RESPONSE TO QUESTION NO. 20:

Recognizing the need to preserve the character of the surrounding area, as well as the deficiency of park lands, the Applicant, as noted above, has committed the 100-acre area separating Sunshine Canyon Landfill from the nearest residential units in Granada Hills as permanent open space. Additionally, the project proponent is dedicating 426 acres in East Canyon and is acquiring 490 acres in Bee Canyon as open space. The Applicant is also dedicating 81 acres along the perimeter of Sunshine Canyon as part of an equestrian/pedestrian trail system, as mentioned in Section 4.0 of the Draft SEIR.

This open space dedication fills a need in the area for park area in the Northwest Valley and is consistent with needs expressed in the Los Angeles Citywide General Plan Framework DEIR, as well as the County of Los Angeles General Plan, Conservation, Open Space, and Recreational Element. In sum, almost 1,100 acres will have been devoted to open space use by the Applicant by the time the subject application is acted upon by the City, while the footprint of the proposed Sunshine Canyon City/County Landfill would occupy a combined (City/County) total of ±450 acres.

The acquisition of the three privately owned parcels noted above and their later transfer to a the Santa Monica Mountains Conservancy or a public park agency, as proposed at the public hearing, is unwarranted. These parcels are somewhat remote and have little or no connection to

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the City/County Landfill area. Given the fact that the City/County will be operating on an already disturbed site and no undisturbed open space having recreational value will be converted to landfill, no nexus exists for the three acquisitions and dedications listed. The Applicant is already committed to the dedication of open space at a ratio of almost 2:1 of open space to working space, the need for additional acquisitions and transfers of ownership to a conservancy or other agency is unnecessary at this time.

QUESTION NO. 21: (ILLUSTRATION OF THE DESIGN OPTIONS) Please provide additional figures that show the CEQA reduced volume alternative as an overlay on the SEIR figure 2.4.5. Also, submit a figure that illustrates the area in the upper canyons of the County that could be considered for expansion.

RESPONSE TO QUESTION NO. 21:

To be separately submitted by the Applicant.

Please contact me if you have any questions regarding these responses or if you need additional information.

Very truly yours,


John C. Funk
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures

cc: Robert Sutton, Deputy Director

R. Nicolas Brown, Hearing Examiner
November 19, 1998
Page 30

bcc: Betsy Lindsay, Ultrasystems
Jim Aidukas, BFI

83- 431375

Recording Requested by
DEPARTMENT OF TRANSPORTATION
Recorded Mail to
STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION
Box 2304 Terminal Annex
Los Angeles, California 90051

INTERSTATE EXCESS LAND

DOCUMENTARY TRANSFER TAX \$12.10
COMPUTED ON FULL VALUE OF PROPERTY CONVEYED.
OR COMPUTED ON FULL VALUE LESS LINES AND
THROATINGS AT TIME OF SALE.
Signature of Deedholder or Agent determining tax. P. 10-10-10

WBP ARCHAMBAULT 6-11-81

WBP by:WBP Checked by:WCG

SPACE ABOVE THIS LINE FOR RECORDING USE

FEE \$7

Wly of LA-5 Pwy and
Sly of Rte 14 Interchange

DIRECTOR'S DEED

MAY 1982 18

DISTRICT	COUNTY	ROUTE	POST MILE	NUMBER
07	LA	5	45.1	1984-01-01

The STATE OF CALIFORNIA, acting by and through its Director of Transportation, does hereby grant to

ACK C. CLONINGER and DONNA BEHRENS CLONINGER, husband and wife
as joint tenants, as to $\frac{1}{4}$ interest and GARRET E. WEYAND and SHIRLEY
T. WEYAND, husband and wife as joint tenants as to $\frac{1}{4}$ interest.

that real property in the City of Los Angeles

City of Los Angeles, State of California, described as:

Lots 63 to 83, inclusive, and those portions of Lots 55, 56, 57, 58, 59, 61, 62, 84, 85, 88, 89, 90, 91, 92 and 93, all above of Tract No. 9673, as shown on map recorded in Book 141, page 77 et seq., of Maps, in the office of the County Recorder of said county, together with those portions of Lot 9 of Tract No. 10422, as shown on map recorded in Book 157, pages 38 to 44, inclusive, of Maps, in said office, all above included within the following described lines:

Commencing at a point in the Northwestern line of said Tract No. 10422, and along said Northwestern line S 47° 49' 48" W, 945.52 feet from the most westerly corner of Lot 10 of said Tract No. 10422; thence S 53° 36' 27" E, 374.38 feet; thence S 6° 53' 47" E, 310.48 feet; thence S 24° 39' 33" E, 61.62 feet to the TRUE POINT OF BEGINNING of this description; thence continuing S 24° 39' 33" E, 143.00 feet; thence S 36° 04' 21" E, 275.15 feet; thence S 07° 23' 44" E, 540.54 feet to the Southeasterly terminus of that course described as S 47° 53' 37" E, 924.58 feet in Parcel 11 (Portion A) of Final Order of Condemnation, filed in Superior Court Case No. 922290, in and for said county, a certified copy of said final order being recorded October 15, 1969 in Book D4526, page 600 of Official Records, in said office; thence S 43° 32' 37" E, 1.82 feet to a point in the South-

MAIL TAX
STATEMENTS TO:

J.C. Cloninger & G.E. Weyand
16961 Knollwood Drive
Granada Hills, CA 91344

1
easterly line of Lot 55 of said Tract No. 9673, distant thereon N 59° 04' 55" E, 33.24 feet from the Southerly corner of said Lot 55, said point being the Northeastly corner of the land described in Parcel 9 of Final Order and Judgment of Inverse Condemnation, filed in Superior Court Case No. NWC 34200, in and for said county, a certified copy of last said final order being recorded August 14, 1979 as Document 79-899840 of said Official Records; thence along the boundary of said Parcel 9 the following three courses: S 43° 32' 37" E, 21.93 feet, S 85° 28' 45" W, 14.40 feet and N 79° 29' 40" W, 22.67 feet to the most Westerly corner of the land described in said Parcel 9 and said Southeastly line of said Lot 55; thence along last said line S 59° 04' 55" W, 8.24 feet to the most Southerly corner of said Lot 55; thence along the Southerly line of said Lot 56, N 78° 26' 19" W, 18.00 feet to the most Easterly corner of the land described in Parcel 8 of last mentioned Order and Judgment of Inverse Condemnation; thence along the boundary of said Parcel 8 the following three courses: S 74° 59' 44" W, 35.78 feet, N 62° 54' 58" W, 18.68 feet and N 39° 50' 20" W, 17.63 feet to the Southwestly corner of said Lot 56; thence along the Westerly lines of said Lots 56 and 57, N 08° 52' 36" W, 116.75 feet to the course described above as S 47° 53' 37" E, 924.58 feet; thence along last mentioned course N 47° 53' 37" W, 140.00 feet to the Southeastly corner of the land described in Parcel 7 of last mentioned Final Order and Judgment of Inverse Condemnation; thence along the boundary of said Parcel 7 the following two courses: N 86° 11' 00" W, 48.42 feet and N 30° 42' 28" W, 101.53 feet to the most Northerly corner of said Parcel 7 and said course described above as S 47° 53' 37" E, 924.58 feet; thence along last mentioned course N 47° 53' 37" W, 127.00 feet to the most Westerly corner of the land described in Parcel 6 of last mentioned Final Order and Judgment of Inverse Condemnation; thence along the boundary of said Parcel 6 the following four courses: N 72° 10' 55" W, 8.25 feet, S 82° 39' 01" W, 20.83 feet, S 52° 18" W, 16.49 feet and N 47° 48' 52" W, 51.24 feet to the most Northerly corner of said Parcel 6 and the Southwestly line of said Lot 71; thence along said Southwestly line N 64° 50' 07" W, 32.06 feet to the most Southerly corner of said Lot 72; thence along the Southwestly line of said Lot 72, N 46° 27' 16" W, 127.00 feet to the most Southerly corner of the land described in Parcel 4, 5 of last mentioned Final Order and Judgment of Inverse Condemnation; thence along the boundary of said Parcel 4, 5 the following eight courses: N 58° 32' 08" W, 30.90 feet, S 42° 05' 08" W, 89.64 feet, N 33° 50' 04" E, 51.11 feet, N 03° 15' 14" E, 20.95 feet, N 89° 23' 25" E, 47.17 feet, N 18° 24' 37" E, 20.95 feet, N 10° 09" E, 29.41 feet and S 58° 57' 11" E, 22.47 feet to the most Easterly corner of said Parcel 4, 5 and the Northwestly line of said Lot 74; thence along last mentioned line N 63° 19' 17" E, 18.00 feet to the Southwestly corner of the land described in Parcel 3 of last mentioned Final Order and Judgment of Inverse Condemnation; thence along the boundary of said Parcel 3 the following three courses: N 07° 00' 47" E, 14.42 feet, N 61° 35' 06" E, 33.02 feet and N 80° 50' 23" E, 22.20 feet to the most Easterly corner of said Parcel 3 and last mentioned Northwestly line; thence along the Northwestly lines of said Lots 74 and 75, N 63° 19' 17" E, 165.00 feet to the most Northerly corner of said Lot 76; thence along the Northeastly line of said Lot 76, S 35° 10' 15" E, 36.00 feet to the most Northerly corner of the land described in Parcel 2 of last mentioned Final Order and Judgment of Inverse Condemnation; thence along the boundary of said Parcel 2 the following three courses: S 79° 02' 52" E, 36.07 feet, S 49° 38' 29" E, 32.02 feet and S 31° 27' 14" E, 10.87 feet to the Southeastly corner of said Parcel 2 and that course described as S 73° 02' 49" W, 475.00 feet in said Parcel 11 (Portion A) of Final Order of Condemnation; thence along last said course N 73° 02' 49" E, 17.00 feet to the Southwestly corner of the land described in Parcel 1 of above mentioned Final Order and Judgment of Inverse Condemnation, filed in Superior Court Case No. NWC 34200, being recorded as

82-421375

Document 79-899840 of said Official Records; thence along the boundary of said Parcel 1 the following three courses: N 18° 11' 26" E, 51.19 feet, N 24° 39' 34" W, 65.00 feet and N 03° 44' 07" W, 36.40 feet to the TRUE POINT OF BEGINNING.

TOGETHER with the underlying interest, if any, in and to those portions of the public ways, Tisdale Drive and Evora Court, both 30 feet wide, as shown on map of said Tract No. 9673, included within the lines of the hereinabove described parcel of land.

There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway.

The above-described real property is landlocked and without any direct access to the freeway or to any public or private road. The State of California is without obligation or liability to provide access to the said real property.

EXCEPTING AND RESERVING unto the State of California, its successors and assigns, an easement for drainage purposes upon, under, over and across that portion of the hereinabove described parcel of land, described as follows:

Beginning at the Southerly terminus of that course hereinbefore described as S 07° 23' 44" E, 540.54 feet; thence along last said course N 07° 23' 44" W, 294.13 feet; thence S 73° 35' 05" W, 223.97 feet to that course hereinbefore described as S 47° 53' 37" E, 924.58 feet; thence along last said course S 47° 53' 37" E, 340.61 feet to the point of beginning.

SUBJECT TO THE EXCEPTION AND RESERVATION THEREFROM, all oil, minerals, natural gas, and other hydrocarbons by whatsoever name known that may be within or under the herein conveyed parcel of land, and the rights thereto, together with certain other conditions, as excepted and reserved in said Parcel 11 and in Parcels 7D, 7E and 7F, all of said first above mentioned Final Order of Condemnation.

83-431375

subject to special assessments if any, restrictions, reservations, and easements of record.

This conveyance is executed pursuant to the authority vested in the Director of Transportation of the State of California, in particular, by the Streets and Highways Code.

WITNESS my hand and the seal of the Department of Transportation of the State of California,

day of June, 1982

DEPARTMENT

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

ADRIANA GIANTURCO
DIRECTOR OF TRANSPORTATION

BY ROBERT O. WATKINS

Deputy Director of Transportation

STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

On this 2nd day of June, in the year 1982, before me, Marjorie Egloff, Notary Public in and for the State of California, residing therein, duly commissioned and sworn, personally appeared ROBERT O. WATKINS, known to me to be the person whose name is subscribed to the within instrument as the Attorney in Fact of ADRIANA GIANTURCO, Director of Transportation of the State of California, and known to me to be the person who executed the within instrument on behalf of the State of California, and he acknowledged to me that he subscribed the name of ADRIANA GIANTURCO as Director of Transportation, and his own name as Attorney in Fact, and that the State of California executed the same.

WITNESS my hand and official seal



83-431375

Marjorie Egloff
Notary Public

THIS IS TO CERTIFY That the California Transportation Commission has authorized the Director of Transportation to execute the foregoing deed at its meeting regularly called and held on the 29th

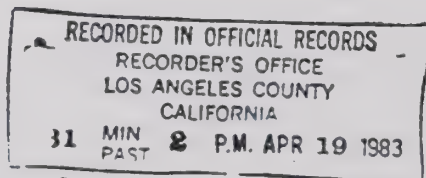
day of May, 1982, in the

City of San Francisco

Dated this 2nd day of June, 1982.

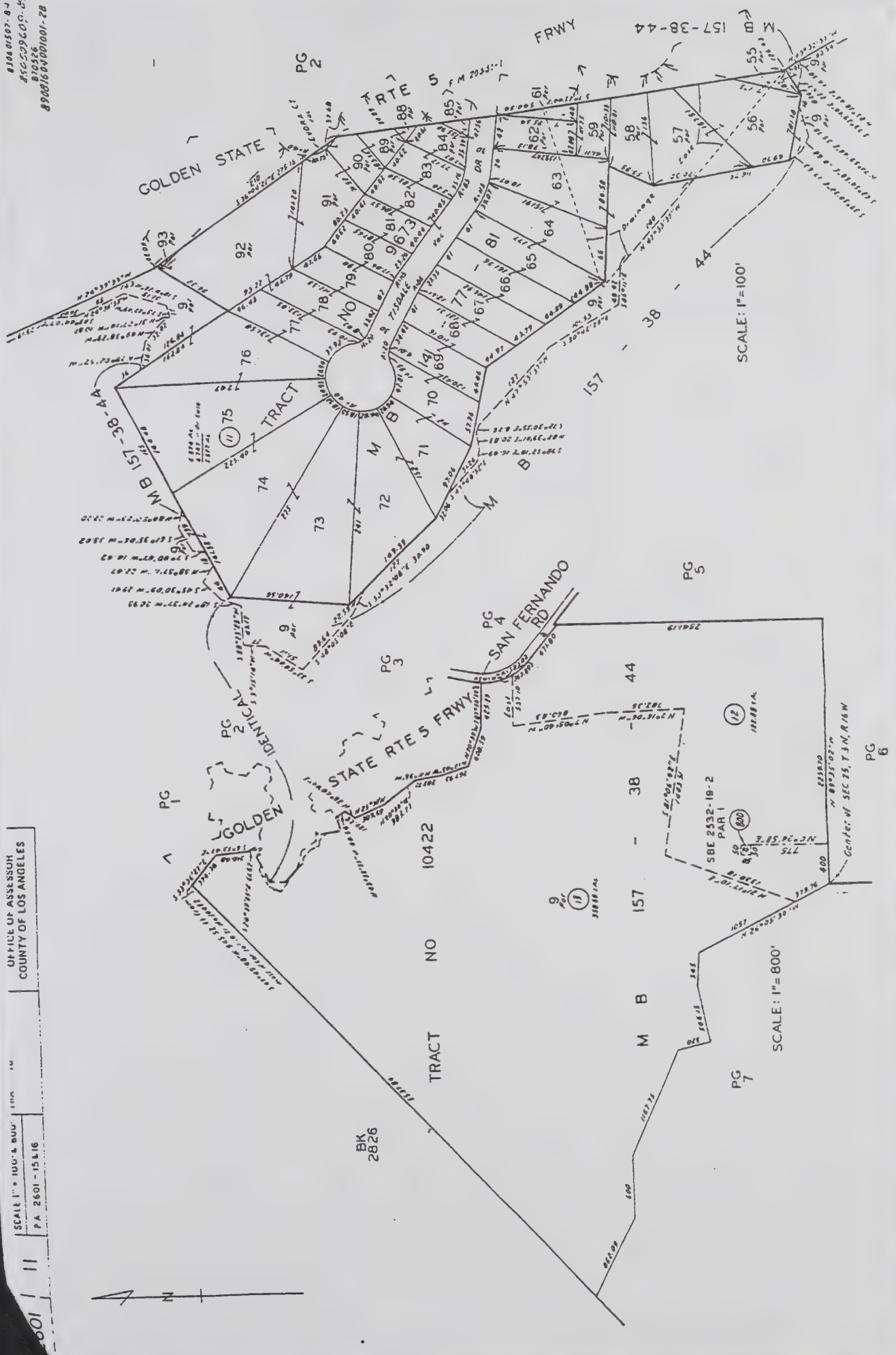
Richard A. Donaldson

RICHARD A. DONALDSON
Assistant Secretary
California Transportation Commission



81040507-9-4
 85029600-8-2
 870326
 89001604001001-20

SCALE 1" = 100' & 800'
 P.A. 2601-15 & 16
 OFFICE OF ASSESSOR
 COUNTY OF LOS ANGELES



DECEMBER 3, 1998 - RESPONSES
- Exhibit No. E-15

LAW OFFICES OF
PAUL, HASTINGS, JANOFSKY & WALKER LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

600 PEACHTREE ST., N.E., STE. 2400
 ATLANTA, GEORGIA 30308-2222
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345 CALIFORNIA STREET
 SAN FRANCISCO, CALIFORNIA 94104-2635
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695 TOWN CENTER DRIVE
 COSTA MESA, CALIFORNIA 92626-1924
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ROBERT P. HASTINGS (1910-1996)
 COUNSEL
 LEE G. PAUL
 LEONARD S. JANOFSKY
 CHARLES M. WALKER

ARK MORI BUILDING
 12-32, AKASAKA 1-CHOME
 MINATO-KU, TOKYO 107, JAPAN
 TELEPHONE (03) 3586-4711

1299 PENNSYLVANIA AVENUE, N.W.
 WASHINGTON, D.C. 20004-2400
 TELEPHONE (202) 508-9500

December 3, 1998

WRITER'S DIRECT ACCESS

OUR FILE NO.

(213) 683-6271
jcfunk@phjw.com

VIA MESSENGER

Mr. Nicolas Brown
 Hearing Examiner
 Department of City Planning
 221 South Figueroa Street, 3rd Floor
 Los Angeles, California 90012

Re: Sunshine Canyon Landfill; Responses to Comments and Project Justifications

Dear Mr. Brown:

With this correspondence, I am transmitting the following documents that pertain to the application of Browning-Ferris Industries of California, Inc. (the "Applicant") for a General Plan Amendment and Zone Change (CPC No. 98-0184MPR/ZC/GPA) for the extension of landfilling back into the City area of Sunshine Canyon. Specifically, the documents enclosed herewith are as follows:

1. Supplemental responses to questions contained in your November 12, 1998 letter, including a referenced question from your October 23, 1998 letter;
2. A list of the Topical Issues relative to the subject application;
3. A set of draft Topical Issues Responses, which consist of an augmented version of the Topical Issue Responses contained in the certifiable Final SEIR and certain additional Topic Issue Responses, and which will be finalized in light of any late-received comments; and
4. A set of Justifications relative to the proposed General Plan Amendment and Zone Change.

Mr. Nicolas Brown
December 3, 1998
Page 2

Inasmuch as the subject Topical Issue Responses enhance those contained in the certifiable Final SEIR, I will be providing a separate copy of the enhanced responses to Irene Paul, and I will also be providing each of you with a red-lined version which indicates the areas of change and augmentation of the original version. These documents will be provided to you by December 17, along with a matrix which cross-references to the Topical Issue Responses the various questions and comments contained in the testimony of individuals at the October 29, 1998 hearing, as well as those contained in documents submitted to your office relative to the application on or before December 3.

I look forward to continuing our work with your staff relative to this matter.

Very truly yours,



John C. Funk
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

JCF:ags
Enclosures

cc: Daniel Tempelis (w/encl.)

Supplemental Responses to City Questions
Sunshine Canyon Landfill (CPC No. 98-0184 MPR/2C/GPA);

1. Response to October 23, 1998 Letter

Supplemental Response to Question No.2: *Why hasn't the applicant revegetated the inactive City landfill?*

As discussed in FEIR response No. 356, the existing City Landfill is currently defined as "inactive." The Final Closure and Postclosure Maintenance Plan (FCPMP) for the Sunshine Canyon Landfill was prepared by consulting engineers and submitted to the California Integrated Waste Management Board (CIWMB), the Los Angeles Regional Water Quality Control Board (LARWQCB), and City LEA in November 1990 for their review. That document was subsequently revised and resubmitted to the same agencies in April 1991 (First Revision), April 1992 (Second Revision), November 1994 (Third Revision), and March 1997 (Fourth Revision) in response to comments received by these agencies. (As noted in the prior response, the City's involvement in this review process was delayed by the litigation pursued by the City against the County and the Applicant relative to the County Landfill.) The final plan, along with its associated environmental documentation (i.e., Initial Study and Mitigated Negative Declaration), is currently pending approval by the City LEA and CIWMB.

With respect to the task of revegetating the landfill area, it is important to recognize that the revegetation process entails far more than installing an irrigation system and planting vegetation. In accordance with CCR, Title 27, §21090 and §21140, final cover material must be placed on the existing inactive City Landfill's top slopes, side slopes, and bench areas; and the proposed final cover will consist of a monolithic soil layer (an approved final cover design consisting of a five-foot-thick, low-permeability soil layer rather than the prescriptive standard final cover design, which consists of a foundation soil layer and low-hydraulic conductivity soil layer). The proposed final cover will rely on evapotranspiration and unsaturated permeability to control water infiltration. The proposed final cover design will have a one-foot-thick vegetation erosion control layer overlying the five-foot-thick monolithic barrier comprised of cover soil. The FCPMP indicates that the

proposed final cover will provide superior infiltration resistance compared to the prescriptive standard cover. The vegetative layer would be placed on top of the final cover on those portions of the landfill's top slopes, side slopes, and bench areas that are not part of the proposed City/County Landfill project design. Vegetative cover would be placed on an estimated ± 125 acres of the ± 205 -acre, inactive City Landfill.

The vegetative layer would provide long-term erosion control caused by potential surface water runoff. When revegetated, a permanent grass and legume cover will provide an effective means of controlling any fugitive dust emissions. Selected plant species would be chosen for rapid establishment. Due to the existing terrain, the seed mix chosen would be comprised of shallow-rooted (less than 12 inches) drought- and pH-tolerant plants. Native and nonnative seed mix would be applied. It is anticipated that the vegetation cover soil would eventually evolve into a mosaic of shrubs interspersed with annual grasslands. Once established, selected plant species are intended to be self-propagating and not require excessive irrigation or long-term maintenance.

To ensure successful revegetation, a three-year monitoring and maintenance program would be implemented. Periodically, revegetated areas would be monitored for growth and survival rates. A follow-up maintenance and monitoring program would be implemented during the 30-year postclosure maintenance period.

It should also be noted that the City/County Landfill will be planted with a variety of trees, shrubs, and grasslands to provide wildlife habitats. As operating landfill areas are completed, the finished slopes will be covered with both amended soil and recycled green waste material. These materials will be placed on the front surface of slopes after they have received an impermeable seal. As soils are added, amendments will be included to balance any unsuitable characteristics such as acidity (pH), and fertilizers will be added at the time of soil placement and continued as part of the project proponent's ongoing maintenance program. This soil cover will provide rooting material for the final vegetation. The Applicant also proposes that revegetation will take place concurrently with filling operations as the landfill progresses up the canyon; only the active filling areas and other operational

areas of landfill will not be vegetated. The remainder of the inactive disturbed areas onsite will be planted with either temporary vegetation (on areas that remain inactive for a period longer than 180 days) or permanent vegetation.

Revegetation of slopes and fill areas with appropriate native flora will be accomplished to support local fauna. As part of the proposed revegetation plan, the reestablishment of vegetation will focus on using native species from local seed sources. A nonnative species may be used only if it is approved by the consulting biologists for areas where quick cover or a nurse crop is needed, and it would be removed later if appropriate. Replacement cover material will be obtained from within Sunshine Canyon to retain soil composition compatible with native flora and leave the surrounding topography undisturbed.

This proposed alternative final cover system would be in compliance with CCR, Title 27, §21090, which states in part:

The RWQCB can allow any alternative final cover design that it finds will continue to isolate the waste in the Unit from precipitation and irrigation waters at least as well as would a final cover built in accordance with applicable revised prescriptive standards. . .

Finally, the 100-acre area located southeast of the inactive City Landfill will be maintained as open space and will be enhanced with natural vegetation to promote wildlife in this area. Appropriate planting locations will be selected within this area based on soils, slope steepness and aspect. The external abutting slopes and peaks of the inactive City landfill will remain undisturbed. The upper portions of the ridgeline (i.e., 50 vertical feet below the ridgeline) will also be left undisturbed. The upper perimeter ridges of the inactive City Landfill will be planted with native trees (following the approval of the FCPMP by the City LEA) in order to minimize visibility of the inactive City Landfill and proposed City/County Landfill.

2. Response to November 12, 1998 Letter

Supplemental Response to Question No. 17-B: *Concern was raised at the public hearing regarding air quality by the Los Angeles Unified School District. The quantitative analysis on the probability of the health effects of the landfill operational mobile sources highlighted the issue of exceeding toxic and criteria pollutants. The testimony also contradicts the conclusions reached in the SEIR. Please address the testimony and provide additional supporting documentation for your methodology and conclusions.*

In a letter submitted by Mr. Bill Piazza, the Environmental Assessment Coordinator of the Los Angeles Unified School District (LAUSD), at the October 29, 1998 hearing, the LAUSD evaluated two potential impacts of the landfill on the air quality at the Van Gogh Elementary School: the long-term health impact of diesel particulate matter, and the potential for exceedance of the nitrogen dioxide (NO₂) standard as a result of emissions by heavy duty diesel vehicles (i.e., both landfill equipment and waste trucks). A review by the Applicant's air quality expert, ENVIRON, shows that the LAUSD analysis is flawed and that the landfill will result in neither an adverse health impact, nor an exceedance of the NO₂ standard at the Van Gogh Elementary School. A discussion of ENVIRON's review follows.

Diesel Particulate Impact Evaluation

The LAUSD evaluated the carcinogenic impact that diesel particulate emitted from heavy duty diesel vehicles at the landfill may have on students at the Van Gogh Elementary School and found an adjusted lifetime cancer risk of 1.24×10^{-5} as compared to the State of California's threshold of 1×10^{-5} . There are several aspects of the LAUSD's analysis that led to an overestimation of impacts from the landfill: source configuration, emissions factors for heavy duty diesel equipment, risk assessment parameters, and source parameters. Each of these is discussed, either quantitatively or qualitatively, below.

For evaluating carcinogenic impacts, it is appropriate to look at the long-term (i.e., 70 years) impacts of operations. The LAUSD estimated a one-year average concentration of diesel particulate at the school using the operating configuration similar to that presented in the FSEIR. However, that

configuration represented the highest impact on the community because of the proximity of the operation to the residences. For many air quality analyses, a one-year average concentration could appropriately represent long-term concentrations for estimating carcinogenic impacts. However, in the case of the landfill, the use of the operating configuration that had the highest impacts on the nearest residential community overestimates the impacts. While the source configuration was appropriate for the FSEIR evaluations of fugitive dust emissions, where the longest averaging period was one year, it is inappropriate for the evaluation of the impact of diesel exhaust, where the averaging time is at least 25 years, the life of the landfill.

Additionally, to properly evaluate the impacts of long-term operations, emissions from heavy duty diesel vehicles should be evaluated as if they emanate from the entire surface of the landfill, not only the closest possible area of operations. If the modeling is revised only by using the appropriate source area, and retaining all other LAUSD assumptions, the carcinogenic impacts from diesel particulate at the Van Gogh Elementary School drop below a level of concern. The new risk level is 7×10^{-6} ; this is below the State of California's threshold of 1×10^{-5} . The results of this new modeling analysis are in Appendix A.

Furthermore, the LAUSD's analysis overestimated the levels of emissions of particulate matter from the diesel exhaust. The analysis assumed that today's heavy equipment is representative of the current fleet, which includes a mix of older and newer equipment. However, the project's long-term impacts are evaluated over the next 25 years. It is, therefore, appropriate to use a fleet of vehicles that are model year 1998 or newer. The LAUSD's analysis also used USEPA's Tier 1 limit for compression-ignition engines for emissions from heavy equipment from USEPA's Report No. NR-009 titled "Exhaust Emission Factors for Nonroad Engine Modeling—Compression Ignition". Recent certification data for the 1998 model year from USEPA's webpage indicate that most equipment produces lower particulate emissions than USEPA's Tier 1 limit. If one simply assumes that all vehicles are 1998 or newer for future operations and uses the USEPA's most recent certification data, then the emissions rates drop by more than 40%, and the resulting health impact discussed above, which is already below a level of significance, also drops by more than 40%. Thus, the health impact that is calculated above to be below a level of significance,

is reduced again, putting the risk at 4×10^{-6} . Appendix B shows the recalculated emissions.

An additional flaw in the LAUSD's analysis is the use of EMFAC7F for emissions from on-road vehicles such as garbage trucks and water trucks, with the claim that EMFAC7F is appropriate for microscale analysis and that EMFAC7G, which was used in the FSEIR, is only appropriate for regional source emission inventories. To the contrary, EMFAC7G is the most recent version of the model and it has replaced EMFAC7F. The California Air Resources Board (CARB) has agreed to allow the use of EMFAC7F instead of EMFAC7G only for microscale analysis, which is an analysis performed for transportation projects for the pollutant carbon monoxide (CO). The reason that EMFAC7F is used instead of EMFAC7G for transportation projects for CO is that one of the major changes from EMFAC7F to EMFAC7G was the addition of emissions for aggressive driving (high speeds and/or accelerations) that were not included in EMFAC7F, and this change increases CO emissions substantially. For analyses of all other emissions, in all other situations, EMFAC7G is the appropriate model to use. There are substantial differences in the methods used to calculate heavy duty diesel vehicle particulate matter emission factors between EMFAC7F and EMFAC7G. These methodological changes produce substantial decreases in emissions, which would further lower the health impact.

There are several other aspects to the LAUSD's analysis that led to an overestimation of carcinogenic impacts that may result from particulate emissions from tailpipes. First, the LAUSD used elevated area sources to simulate the tailpipe exhaust from an area. Area sources do not take into account the impacts of changing elevation (they are "terrain following"). If the LAUSD had used volume sources, which are not terrain following, along with the proper elevations at the site, the elevation difference between the release point and the school that is in excess of 100 meters would have resulted in a significant decrease in the modeled concentrations. Second, the LAUSD's analysis considered emissions from dirt trucks on the working face area, other landfill areas, and roads in between areas at the landfill. In its analysis, the LAUSD assumed eight hours of operational emissions from the dirt trucks in the landfill areas and approximately a half an hour of operational emissions from the dirt trucks on the unpaved roads. The dirt trucks are each only operating for a total of eight hours according to the FSEIR not a total of 8.5 hours. It is appropriate to subtract the time the dirt trucks spend on

the unpaved roads from the time the dirt trucks spend on different landfill areas. This will also result in a lower concentration at the school.

Therefore, as noted in the beginning of this writeup, when calculated properly, the cancer risk is less than one-half of the California Proposition 65 standard.

Exceedance of Nitrogen Dioxide Ambient Air Quality Limit

The LAUSD presented the results from its NO₂ analysis by stating that A....project related emissions may (not would) combine with existing background concentrations and exceed the State Ambient Air Quality Standard. The LAUSD's analysis used emission rates that are far higher than will exist when the section of the landfill that is the closest to the residences is being used and it is a screening-level analysis, which does not consider that all NO_x is not emitted as NO₂. Both issues are discussed further below.

The LAUSD used values for NO_x emissions for off-road heavy equipment from the USEPA's Report No. NR-009 for the years 1996-2001. The area of the landfill that is being modeled by the LAUSD will not be active until near the end of the landfill life, 2023. As landfill equipment lasts no longer than 10 years, the equipment working on that area would be no older than the 2013 model year. Using the emission rates for the newer model years from the same document, results in concentrations at the Van Gogh Elementary School below that of the California Ambient Air Quality Standards, even when including background. The analysis is shown in Appendix C.

It is important to note that even this analysis, which shows that the concentrations are below a level of concern, is still a screening analysis. There are several factors which would result in even lower values. For one thing, the LAUSD did not consider that the majority of nitrogen oxide (NO_x) emitted from exhaust is nitric oxide (NO) rather than NO₂. Although NO can convert to NO₂ in the air over time, it is neither rapid nor complete and is limited by the amount of ozone (O₃) in the ambient air. Therefore, the analysis provided by the LAUSD is an overestimate of the impacts. Furthermore, the use of elevated area sources, excessive dirt truck emissions, and the use of EMFAC7F in the LAUSD's analysis of NO₂ will also tend to overestimate NO₂ levels.

APPENDIX A

PAGE 1

**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** MODEL SETUP OPTIONS SUMMARY ***

**Intermediate Terrain Processing is Selected

**Model Is Setup For Calculation of Average CONCentration Values.

-- SCAVENGING/DEPOSITION LOGIC --

**Model Uses DRY DEPLETION. DDPLETE = T

**Model Uses NO WET DEPLETION. WDPLETE = F

**NO WET SCAVENGING Data Provided.

**Model Does NOT Use GRIDDED TERRAIN Data for Depletion Calculations

**Model Uses RURAL Dispersion.

**Model Uses User-Specified Options:

1. Final Plume Rise.
2. Not Use Stack-tip Downwash.
3. Not Use Buoyancy-induced Dispersion.
4. Not Use Calms Processing Routine.
5. Not Use Missing Data Processing Routine.
6. Default Wind Profile Exponents.
7. Default Vertical Potential Temperature Gradients.

**Model Assumes Receptors on FLAT Terrain.

**Model Assumes No FLAGPOLE Receptor Heights.

**Model Calculates ANNUAL Averages Only

**This Run Includes: 9 Source(s); 1 Source Group(s); and 1 Receptor(s)

**The Model Assumes A Pollutant Type of: PM10

**Model Set To Continue RUNning After the Setup Testing.

**Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor

**Misc. Inputs: Anem. Hgt. (m) = 10.00 ; Decay Coef. = .0000 ; Rot. Angle = .0

Emission Units = GRAMS/SEC

; Emission Rate Unit Factor = .10000E+07

Output Units = MICROGRAMS/M**3

**Input Runstream File: C:\TRINITY\SUITE\SUNPM10.DAT ; **Output Print File: C:\TRINITY\SUITE\SUNPM10.LST

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** AREA SOURCE DATA ***

NUMBER EMISSION RATE COORD (SW CORNER) BASE RELEASE X-DIM Y-DIM ORIENT. INIT. EMISSION RATE
SOURCE PART. (GRAMS/SEC X Y ELEV. HEIGHT OF AREA OF AREA OF AREA SZ SCALAR VARY
ID CATS. /METER**2) (METERS) (METERS) (METERS) (METERS) (METERS) (METERS) (DEG.) (METERS) BY

HE1	6	.29620E-06	361422.6	3798495.0	.0	3.00	134.10	91.40	.00	2.00	HROFDY		
HE2	6	.29620E-06	361276.2	3798593.0	.0	3.00	335.30	146.30	.00	2.00	HROFDY		
HE3	6	.29620E-06	361001.9	3798742.0	.0	3.00	512.10	134.10	.00	2.00	HROFDY		
HE4	6	.29620E-06	360200.3	3798879.0	.0	3.00	1158.20	317.00	.00	2.00	HROFDY		
HE5	6	.29620E-06	360776.4	3799199.0	.0	3.00	402.30	304.80	.00	2.00	HROFDY		
HE6	6	.29620E-06	359971.7	3799199.0	.0	3.00	798.60	786.40	.00	2.00	HROFDY		
PR1	6	.29981E-05	361435.0	3799040.0	.0	3.00	12.00	87.00	60.00	2.00	HROFDY		
PR2	6	.29981E-05	361500.0	3799078.0	.0	3.00	12.00	87.00	75.00	2.00	HROFDY		
UR1	6	.30486E-05	361435.0	3798922.0	.0	3.00	12.00	120.00	.00	2.00	HROFDY		

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** SOURCE IDs DEFINING SOURCE GROUPS ***

GROUP ID SOURCE IDs

ALL HE1 ,HE2 ,HE3 ,HE4 ,HE5 ,HE6 ,PR1 ,PR2 ,UR1 ,

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** SOURCE PARTICULATE/GAS DATA ***

*** SOURCE ID = HE1 ; SOURCE TYPE = AREA ***

MASS FRACTION =
.85400, .06250, .02080, .02080, .01040, .03130,
PARTICLE DIAMETER (MICRONS) =
.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,
PARTICLE DENSITY (G/CM**3) =
2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** SOURCE ID = HE2 ; SOURCE TYPE = AREA ***

MASS FRACTION =
.85400, .06250, .02080, .02080, .01040, .03130,
PARTICLE DIAMETER (MICRONS) =
.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,
PARTICLE DENSITY (G/CM**3) =
2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** SOURCE ID = HE3 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

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**MODELOPTs: CONC

RURAL FLAT

NOSTD NOBID NOCALM

DRYDPL

*** SOURCE PARTICULATE/GAS DATA ***

*** SOURCE ID = HE4 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** SOURCE ID = HE5 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** SOURCE ID = HE6 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES ***

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**MODELOPTs: CONC

RURAL FLAT

NOSTD NOBID NOCALM

DRYDPL

*** SOURCE PARTICULATE/GAS DATA ***

*** SOURCE ID = PR1 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** SOURCE ID = PR2 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** SOURCE ID = UR1 ; SOURCE TYPE = AREA ***

MASS FRACTION =

.85400, .06250, .02080, .02080, .01040, .03130,

PARTICLE DIAMETER (MICRONS) =

.50000, 1.50000, 2.25000, 3.50000, 4.50000, 8.00000,

PARTICLE DENSITY (G/CM**3) =

2.00000, 2.00000, 2.00000, 2.00000, 2.00000, 2.00000,

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = HE1 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = HE2 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = HE3 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = HE4 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = HE5 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = HE6 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = PR1 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = PR2 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = UR1 ; SOURCE TYPE = AREA :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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*** DISCRETE CARTESIAN RECEPTORS ***
 (X-COORD, Y-COORD, ZELEV, ZFLAG)
 (METERS)

(361515.5, 3796885.0, .0, .0);

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
 (1=YES; 0=NO)

```

0000000000 0111110001 1110011111 0011111000 1111000111
1001111100 1111100111 1100111110 0111110011 1110000000
0011111001 1111001111 1001111100 1111100111 1100011110
0111110011 1110011111 0000000000 0000000000 0000000000
0000000000 0000000000 0000000000 0000000000 0000111001
1111001111 1001111100 1111100111 1100111110 0111110011
1110011111 0010111001 1111001110 0001111100 1111100111
1100000000 000000
  
```

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
 (METERS/SEC)

1.80, 3.35, 5.41, 8.49, 11.07,

*** WIND PROFILE EXPONENTS ***

STABILITY	WIND SPEED CATEGORY					
CATEGORY	1	2	3	4	5	6
A	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01
B	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01
C	.10000E+00	.10000E+00	.10000E+00	.10000E+00	.10000E+00	.10000E+00
D	.15000E+00	.15000E+00	.15000E+00	.15000E+00	.15000E+00	.15000E+00
E	.35000E+00	.35000E+00	.35000E+00	.35000E+00	.35000E+00	.35000E+00
F	.55000E+00	.55000E+00	.55000E+00	.55000E+00	.55000E+00	.55000E+00

*** VERTICAL POTENTIAL TEMPERATURE GRADIENTS ***
 (DEGREES KELVIN PER METER)

STABILITY	WIND SPEED CATEGORY					
CATEGORY	1	2	3	4	5	6
A	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
B	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
C	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
D	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
E	.20000E-01	.20000E-01	.20000E-01	.20000E-01	.20000E-01	.20000E-01

F .35000E-01 .35000E-01 .35000E-01 .35000E-01 .35000E-01 .35000E-01
*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

FILE: C:\TRINITY\SUITE\FILES\SUN.ASC FORMAT: (4I2,2F9.4,F6.1,I2,2F7.1,f9.4,f10.1,f8.4,i4,f7.2)
SURFACE STATION NO.: 51115 UPPER AIR STATION NO.: 99999
NAME: UNKNOWN NAME: UNKNOWN
YEAR: 1981 YEAR: 1981

FLOW SPEED TEMP STAB MIXING HEIGHT (M) USTAR M-O LENGTH Z-0 IPCODE PRATE
YR MN DY HR VECTOR (M/S) (K) CLASS RURAL URBAN (M/S) (M) (M) (mm/HR)

81 1 1 1 314.8 1.00 285.9 7 522.6 170.0 .0898 13.7 .7000 0 .00
81 1 1 2 304.9 .00 284.8 7 507.0 170.0 .0000 .0 .7000 0 .00
81 1 1 3 310.0 .00 284.8 7 491.4 170.0 .0000 .0 .7000 0 .00
81 1 1 4 346.0 1.00 284.8 7 475.8 170.0 .0897 13.7 .7000 0 .00
81 1 1 5 309.0 1.00 285.4 7 460.3 170.0 .0898 13.7 .7000 0 .00
81 1 1 6 342.0 1.00 284.3 7 444.7 170.0 .0898 13.7 .7000 0 .00
81 1 1 7 342.0 .00 284.3 7 429.1 170.0 .0000 .0 .7000 0 .00
81 1 1 8 337.1 .00 284.3 6 43.0 190.2 .0000 .0 .7000 0 .00
81 1 1 9 6.5 1.00 287.6 5 89.2 211.8 .2138 -30.8 .7000 0 .00
81 1 1 10 9.1 .00 291.5 4 135.3 233.4 .0000 .0 .7000 0 .00
81 1 1 11 291.6 1.00 297.0 3 181.5 255.1 .2414 -9.1 .7000 0 .00
81 1 1 12 80.6 1.00 298.7 2 227.7 276.7 .2443 -8.1 .7000 0 .00
81 1 1 13 87.2 .00 299.3 2 273.8 298.4 .0000 .0 .7000 0 .00
81 1 1 14 326.7 2.24 299.3 3 320.0 320.0 .4511 -60.1 .7000 0 .00
81 1 1 15 337.3 2.24 298.7 3 320.0 320.0 .4397 -84.5 .7000 0 .00
81 1 1 16 345.7 2.24 297.6 4 320.0 320.0 .4161 -259.0 .7000 0 .00
81 1 1 17 20.1 1.34 294.8 5 325.5 318.6 .1203 13.7 .7000 0 .00
81 1 1 18 97.6 1.00 293.1 6 357.1 310.3 .0897 13.7 .7000 0 .00
81 1 1 19 178.0 1.00 290.9 7 388.7 302.1 .0898 13.7 .7000 0 .00
81 1 1 20 303.2 1.00 289.8 7 420.3 293.9 .0898 13.7 .7000 0 .00
81 1 1 21 358.6 1.00 289.3 7 451.9 285.7 .0898 13.7 .7000 0 .00
81 1 1 22 272.0 1.00 287.6 7 483.5 277.4 .0897 13.7 .7000 0 .00
81 1 1 23 .7 1.00 287.6 7 515.1 269.2 .0897 13.7 .7000 0 .00
81 1 1 24 337.2 1.00 287.6 7 546.7 261.0 .0897 13.7 .7000 0 .00

*** NOTES: STABILITY CLASS 1=A, 2=B, 3=C, 4=D, 5=E AND 6=F.

FLOW VECTOR IS DIRECTION TOWARD WHICH WIND IS BLOWING.

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** THE ANNUAL (4344 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): HE1 , HE2 , HE3 , HE4 , HE5 , HE6 , PR1 ,
PR2 , UR1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM10 IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC

361515.50 3796885.00 .02367
*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** THE SUMMARY OF MAXIMUM ANNUAL (4344 HRS) RESULTS ***

** CONC OF PM10 IN MICROGRAMS/M**3 **
NETWORK
GROUP ID AVERAGE CONC RECEPTOR (XR, YR, ZELEV, ZFLAG) OF TYPE GRID-ID

ALL 1ST HIGHEST VALUE IS .02367 AT (361515.50, 3796885.00, .00, .00) DC NA
2ND HIGHEST VALUE IS .00000 AT (.00, .00, .00, .00)

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
BD = BOUNDARY

*** ISCST3 - VERSION 97363 *** *** SUNSHINE CANYON LANDFILL - AVERAGE LANDFILL LIFETIME SOURCES *** 12/02/98
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM DRYDPL

*** Message Summary : ISCST3 Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 0 Warning Message(s)
A Total of 1085 Informational Message(s)

A Total of 1085 Calm Hours Identified

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
*** NONE ***

*** ISCST3 Finishes Successfully ***

APPENDIX B

Diesel Particulate Matter Emissions with 1998 Certification Data

Equipment	Make	Model	Engine Model	Hp	Comments	Load Factor	Hours	1998 Certification Emission Factor (g/hp-hr)	In-Use Adjustment ^a	Emissions (lbs/day)
Dozer	Caterpillar	D8L	3126	285	Uses D8N power	0.59	10	0.053	1.21	0.24
Dozer	Caterpillar	D8R	3126	305		0.59	10	0.053	1.21	0.25
Dozer	Caterpillar	D7H-LGP	3306	230		0.59	10	0.146	1.21	0.53
Dozer				273		0.59	10	0.084	1.21	0.36
Dozer				273		0.59	10	0.084	1.21	0.36
Grader	Caterpillar	140H	3116	150		0.575	10	0.402	1.21	0.92
Roller\Compactor	Cummins	3-90C	QSK-19	525		0.54	10	0.212	1.21	1.60
Roller\Compactor	Cummins	3-90C	QSK-19	525		0.54	10	0.212	1.21	1.60
Roller\Compactor	Cummins	3-90C	QSK-19	525		0.54	10	0.212	1.21	1.60
Roller\Compactor				525		0.54	10	0.212	1.21	1.60
Roller\Compactor				525		0.54	10	0.212	1.21	1.60
Roller\Compactor				525		0.54	10	0.212	1.21	1.60
Dirt\Haul Truck	Caterpillar	D350-D	3306	285		0.41	8	0.135	2.04	0.57
Dirt\Haul Truck	Volvo	A-40	TD-122 KFE	398		0.41	8	0.11	2.04	0.65
Dirt\Haul Truck	Volvo	A-40	TD-122 KFE	398		0.41	8	0.11	2.04	0.65
Dirt\Haul Truck				360		0.41	8	0.12	2.04	0.63
Dirt\Haul Truck				360		0.41	8	0.12	2.04	0.63
Dirt\Haul Truck				360		0.41	8	0.12	2.04	0.63
Dirt\Haul Truck				360		0.41	8	0.12	2.04	0.63
Excavator	Cummins	EX550BE	N14C	361	Use EX550-5 power	0.58	10	0.104	2.04	0.98
Excavator				361		0.58	10	0.104	2.04	0.98

Total 18.6

Total for LAUSD 36.2

Note: When information on the make, model, and engine model were not available, average values for the same type of equipment was used.

^a In-Use Adjustment factors were obtained from USEPA's Report No. NR-009 titled "Exhaust Emission Factors for Nonroad Engine Modeling--Compression Ignition".

APPENDIX C

Nitrogen Oxide (NO_x) Emissions

Equipment (Source ID)	X-dim (m)	Y-dim (m)	Number of Vehicles	Hours	Hp	Emission Factor ^a (g/hp-hr)	Load Factor	Emission Rate			
								lbs/day	lbs/hour ^c	g/sec	g/s-m ²
BLDZR	63.6	63.6	1	10	280	2.8	0.59	10.2	0.72841	0.09178	2.27E-05
GRADER	63.6	63.6	1	10	150	2.8	0.575	5.3	0.38030	0.04792	1.18E-05
CMPCTR	63.6	63.6	6	10	569	2.8	0.54	113.8	8.12875	1.02420	2.53E-04
DRTRCK	63.6	63.6	3	8	398	2.8	0.41	24.2	1.72681	0.21757	5.38E-05
H2OPLL	63.6	63.6	1	10	536	2.8	0.41	13.6	0.96898	0.12209	3.02E-05
BLLDZR2	402	402	4	10	280	2.8	0.59	40.8	2.91364	0.36711	2.27E-06
DRTRCK2	402	402	4	8	398	2.8	0.41	32.2	2.30241	0.29010	1.80E-06
EXCVTR2	402	402	2	10	365	2.8	0.58	26.1	1.86688	0.23522	1.46E-06
H2OPLL2	402	402	1	10	536	2.8	0.41	13.6	0.96898	0.12209	7.55E-07
UDRTRK1	120	12	1	0.656	398	2.8	0.41	0.6609	0.04721	0.00595	4.13E-06
UDRTRK2	120	12	1	0.656	398	2.8	0.41	0.6609	0.04721	0.00595	4.13E-06
UDRTRK3	120	12	1	0.656	398	2.8	0.41	0.6609	0.04721	0.00595	4.13E-06
UDRTRK4	120	12	1	0.656	398	2.8	0.41	0.6609	0.04721	0.00595	4.13E-06
UDRTRK5	120	12	1	0.656	398	2.8	0.41	0.6609	0.04721	0.00595	4.13E-06
UDRTRK6	65	12	1	0.355	398	2.8	0.41	0.3577	0.02555	0.00322	4.13E-06

Equipment (Source ID)	X-dim (m)	Y-dim (m)	Number of Vehicles	Hours	MPH	Emission Factor ^b (g/mile)	Distance (miles)	Emission Rate			
								lbs/day	lbs/hour ^c	g/sec	g/s-m ²
H2OTRK2	402	402	3	10	5	19.34	-	6.4	0.45683	0.05756	3.56E-07
UXFR TK	12	120	220	14	10	16.05	0.152	1.1794	0.08424	0.01061	7.37E-06
UCRBTRK	12	120	640	14	10	16.05	0.152	3.4309	0.24506	0.03088	2.14E-05
PXFRTRK1	12	87	220	14	10	16.05	0.108	0.8407	0.06005	0.00757	7.25E-06
PCRBTRK1	12	87	640	14	10	16.05	0.108	2.4458	0.17470	0.02201	2.11E-05
PXFRTRK2	12	87	220	14	10	16.05	0.108	0.8407	0.06005	0.00757	7.25E-06
PCRBTRK2	12	87	640	14	10	16.05	0.108	2.4458	0.17470	0.02201	2.11E-05

^a Emission factor based on compliance with Tier 3 federal emission standards.

^b Emission factor based on values determined by the LAUSD.

^c Operational emissions assumed to occur over 14 hours/day.

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

*** MODEL SETUP OPTIONS SUMMARY ***

**Intermediate Terrain Processing is Selected

**Model Is Setup For Calculation of Average CONCentration Values.

-- SCAVENGING/DEPOSITION LOGIC --

**Model Uses NO DRY DEPLETION. DDPLETE = F

**Model Uses NO WET DEPLETION. WDPLETE = F

**NO WET SCAVENGING Data Provided.

**Model Does NOT Use GRIDDED TERRAIN Data for Depletion Calculations

**Model Uses RURAL Dispersion.

**Model Uses User-Specified Options:

1. Final Plume Rise.
2. Not Use Stack-tip Downwash.
3. Not Use Buoyancy-induced Dispersion.
4. Not Use Calms Processing Routine.
5. Not Use Missing Data Processing Routine.
6. Default Wind Profile Exponents.
7. Default Vertical Potential Temperature Gradients.

**Model Assumes Receptors on FLAT Terrain.

**Model Assumes No FLAGPOLE Receptor Heights.

**Model Calculates 1 Short Term Average(s) of: 1-HR

**This Run Includes: 22 Source(s); 1 Source Group(s); and 1 Receptor(s)

**The Model Assumes A Pollutant Type of: NO2

**Model Set To Continue RUNning After the Setup Testing.

**Output Options Selected:

Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)

**Misc. Inputs: Anem. Hgt. (m) = 10.00 ; Decay Coef. = .0000 ; Rot. Angle = .0

Emission Units = GRAMS/PER/SECOND ; Emission Rate Unit Factor = 522.60

Output Units = PARTS/PER/MILLION

**Input Runstream File: C:\TRINITY\SUITE\SUNNOX.DAT ; **Output Print File: C:\TRINITY\SUITE\SUNNOX.LST

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

*** AREA SOURCE DATA ***

NUMBER	EMISSION RATE	COORD (SW CORNER)	BASE	RELEASE	X-DIM	Y-DIM	ORIENT.	INIT.	EMISSION RATE
SOURCE	PART.	(GRAMS/SEC	X	Y	ELEV.	HEIGHT OF AREA	OF AREA	OF AREA	SZ
ID	CATS.	/METER**2)	(METERS)	(METERS)	(METERS)	(METERS)	(METERS)	(DEG.)	(METERS)

BLDZR	0	.22689E-04	361374.0	3798721.0	.0	3.00	63.60	63.60	.00	2.00	HROFDY
GRADER	0	.11846E-04	361374.0	3798721.0	.0	3.00	63.60	63.60	.00	2.00	HROFDY

CMPCTR	0	.25320E-03	361374.0	3798721.0	.0	3.00	63.60	63.60	.00	2.00	HROFDY
DRTRCK	0	.53789E-04	361374.0	3798721.0	.0	3.00	63.60	63.60	.00	2.00	HROFDY
H2OPLL	0	.30183E-04	361374.0	3798721.0	.0	3.00	63.60	63.60	.00	2.00	HROFDY
BLLDZR2	0	.22717E-05	360584.8	3799479.0	.0	3.00	402.00	402.00	.00	2.00	HROFDY
DRTRCK2	0	.17951E-05	360584.8	3799479.0	.0	3.00	402.00	402.00	.00	2.00	HROFDY
EXCVTR2	0	.14555E-05	360584.8	3799479.0	.0	3.00	402.00	402.00	.00	2.00	HROFDY
H2OTRK2	0	.35618E-06	360584.8	3799479.0	.0	3.00	402.00	402.00	.00	2.00	HROFDY
H2OPLL2	0	.75548E-06	360584.8	3799479.0	.0	3.00	402.00	402.00	.00	2.00	HROFDY
UXFRTRK	0	.73681E-05	361435.0	3798922.0	.0	3.00	12.00	120.00	.00	2.00	HROFDY
UCRBTRK	0	.21445E-04	361435.0	3798922.0	.0	3.00	12.00	120.00	.00	2.00	HROFDY
UDRTRK1	0	.41307E-05	360845.0	3799479.0	.0	3.00	120.00	12.00	45.00	2.00	HROFDY
UDRTRK2	0	.41307E-05	360928.0	3799394.0	.0	3.00	120.00	12.00	45.00	2.00	HROFDY
UDRTRK3	0	.41307E-05	361012.0	3799307.0	.0	3.00	120.00	12.00	45.00	2.00	HROFDY
UDRTRK4	0	.41307E-05	361096.0	3799222.0	.0	3.00	120.00	12.00	45.00	2.00	HROFDY
UDRTRK5	0	.41307E-05	361180.0	3799139.0	.0	3.00	120.00	12.00	45.00	2.00	HROFDY
UDRTRK6	0	.41269E-05	361264.0	3799054.0	.0	3.00	65.00	12.00	45.00	2.00	HROFDY
PXFRTRK1	0	.72510E-05	361435.0	3799040.0	.0	3.00	12.00	87.00	60.00	2.00	HROFDY
PCRBTRK1	0	.21082E-04	361435.0	3799040.0	.0	3.00	12.00	87.00	60.00	2.00	HROFDY
PXFRTRK2	0	.72510E-05	361500.0	3799078.0	.0	3.00	12.00	87.00	75.00	2.00	HROFDY
PCRBTRK2	0	.21082E-04	361500.0	3799078.0	.0	3.00	12.00	87.00	75.00	2.00	HROFDY

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

*** SOURCE IDs DEFINING SOURCE GROUPS ***

GROUP ID SOURCE IDs

ALL BLDZR , GRADER , CMPCTR , DRTRCK , H2OPLL , BLDDZR2 , DRTRCK2 , EXCVTR2 , H2OTRK2 , H2OPLL2 , UXFRTRK , UCRBTRK ,
UDRTRK1 , UDRTRK2 , UDRTRK3 , UDRTRK4 , UDRTRK5 , UDRTRK6 , PXFRTRK1 , PCRBTRK1 , PXFRTRK2 , PCRBTRK2 ,
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

SOURCE ID = BLDZR ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = GRADER ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = CMPCTR ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01

13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = DRTRCK ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = H2OPLL ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = BLLDZR2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = DRTRCK2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = EXCVTR2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = H2OTRK2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = H2OPLL2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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**MODELOPTs: CONC

RURAL FLAT

NOSTD NOBID NOCALM

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = UXFRTRK ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = UCRBTRK ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = UDRTRK1 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = UDRTRK2 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = UDRTRK3 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

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**MODELOPTs: CONC

RURAL FLAT

NOSTD NOBID NOCALM

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = UDRTRK4 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = UDRTRK5 ; SOURCE TYPE = AREA :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
---	------------	---	------------	---	------------	---	------------	---	------------	---	------------

7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = UDRTRK6 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = PXFRTRK1 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = PCRBTRK1 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = PXFRTRK2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = PCRBTRK2 ; SOURCE TYPE = AREA :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZFLAG)
(METERS)

(361515.5, 3796885.0, .0, .0);

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

[illegible]

*** WIND PROFILE EXPONENTS ***

STABILITY CATEGORY	WIND SPEED CATEGORY					
	1	2	3	4	5	6
A	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01
B	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01	.70000E-01
C	.10000E+00	.10000E+00	.10000E+00	.10000E+00	.10000E+00	.10000E+00
D	.15000E+00	.15000E+00	.15000E+00	.15000E+00	.15000E+00	.15000E+00
E	.35000E+00	.35000E+00	.35000E+00	.35000E+00	.35000E+00	.35000E+00
F	.55000E+00	.55000E+00	.55000E+00	.55000E+00	.55000E+00	.55000E+00

STABILITY CATEGORY	WIND SPEED CATEGORY					
	1	2	3	4	5	6
A	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
B	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
C	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
D	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
E	.20000E-01	.20000E-01	.20000E-01	.20000E-01	.20000E-01	.20000E-01
F	.35000E-01	.35000E-01	.35000E-01	.35000E-01	.35000E-01	.35000E-01

*** THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

6 of 8

81	1	1	1	314.8	1.00	285.9	7	522.6	170.0	.0000	.0	.0000	0	.00
81	1	1	2	304.9	.00	284.8	7	507.0	170.0	.0000	.0	.0000	0	.00
81	1	1	3	310.0	.00	284.8	7	491.4	170.0	.0000	.0	.0000	0	.00
81	1	1	4	346.0	1.00	284.8	7	475.8	170.0	.0000	.0	.0000	0	.00
81	1	1	5	309.0	1.00	285.4	7	460.3	170.0	.0000	.0	.0000	0	.00
81	1	1	6	342.0	1.00	284.3	7	444.7	170.0	.0000	.0	.0000	0	.00
81	1	1	7	342.0	.00	284.3	7	429.1	170.0	.0000	.0	.0000	0	.00
81	1	1	8	337.1	.00	284.3	6	43.0	190.2	.0000	.0	.0000	0	.00
81	1	1	9	6.5	1.00	287.6	5	89.2	211.8	.0000	.0	.0000	0	.00
81	1	1	10	9.1	.00	291.5	4	135.3	233.4	.0000	.0	.0000	0	.00
81	1	1	11	291.6	1.00	297.0	3	181.5	255.1	.0000	.0	.0000	0	.00
81	1	1	12	80.6	1.00	298.7	2	227.7	276.7	.0000	.0	.0000	0	.00
81	1	1	13	87.2	.00	299.3	2	273.8	298.4	.0000	.0	.0000	0	.00
81	1	1	14	326.7	2.24	299.3	3	320.0	320.0	.0000	.0	.0000	0	.00
81	1	1	15	337.3	2.24	298.7	3	320.0	320.0	.0000	.0	.0000	0	.00
81	1	1	16	345.7	2.24	297.6	4	320.0	320.0	.0000	.0	.0000	0	.00
81	1	1	17	20.1	1.34	294.8	5	325.5	318.6	.0000	.0	.0000	0	.00
81	1	1	18	97.6	1.00	293.1	6	357.1	310.3	.0000	.0	.0000	0	.00
81	1	1	19	178.0	1.00	290.9	7	388.7	302.1	.0000	.0	.0000	0	.00
81	1	1	20	303.2	1.00	289.8	7	420.3	293.9	.0000	.0	.0000	0	.00
81	1	1	21	358.6	1.00	289.3	7	451.9	285.7	.0000	.0	.0000	0	.00
81	1	1	22	272.0	1.00	287.6	7	483.5	277.4	.0000	.0	.0000	0	.00
81	1	1	23	.7	1.00	287.6	7	515.1	269.2	.0000	.0	.0000	0	.00
81	1	1	24	337.2	1.00	287.6	7	546.7	261.0	.0000	.0	.0000	0	.00

*** NOTES: STABILITY CLASS 1=A, 2=B, 3=C, 4=D, 5=E AND 6=F.

FLOW VECTOR IS DIRECTION TOWARD WHICH WIND IS BLOWING.

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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): BLDZR , GRADER , CMPCTR , DRTRCK , H2OPLL , BLDDZR2 , DRTRCK2 ,
EXCVTR2 , H2OTRK2 , H2OPLL2 , UXFRTRK , UCRBTRK , UDRTRK1 , UDRTRK2 , UDRTRK3 , UDRTRK4 , UDRTRK5 , UDRTRK6 , PXFRTRK1 ,
PCRBTRK1 , PXFRTRK2 , PCRBTRK2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF NO2 IN PARTS/PER/MILLION **

X-COORD (M)	Y-COORD (M)	CONC (YYYYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC (YYYYMMDDHH)
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361515.50	3796885.00	.08112 (1981010209)
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**MODELOPTs: CONC RURAL FLAT NOSTD NOBID NOCALM

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF NO2 IN PARTS/PER/MILLION **

GROUP ID	DATE AVERAGE CONC (YYYYMMDDHH)	NETWORK RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	GRID-ID
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ALL	HIGH 1ST HIGH VALUE IS .08112 ON 1981010209: AT (361515.50, 3796885.00, .00, .00) DC	NA
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*** RECEPTOR TYPES: GC = GRIDCART

GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
BD = BOUNDARY

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**MODELOPTs: CONC

RURAL FLAT

NOSTD NOBID NOCALM

*** Message Summary : ISCST3 Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 0 Warning Message(s)
A Total of 1085 Informational Message(s)

A Total of 1085 Calm Hours Identified

***** FATAL ERROR MESSAGES *****

*** NONE ***

***** WARNING MESSAGES *****

*** NONE ***

*** ISCST3 Finishes Successfully ***

SUNSHINE CANYON LANDFILL

LIST OF TOPICAL ISSUES

Topical Issue 1: Seismicity

Questions have been raised regarding the ability of the proposed City/County Landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 2: Landfill Stability During Northridge Earthquake

Questions have been raised regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake. Additionally, the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake have been questioned.

Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions

Concerns have been raised regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills.

Topical Issue 4: Landfill Gas Generation and Odor Control

Concerns have been raised that the proposed City/County Landfill would generate substantial volumes of LFG, resulting in the potential for odor migration onto sensitive land uses.

Topical Issue 5: Stormwater Runoff Control Measures

Questions have been raised regarding the project proponent's ability to control and contain stormwater runoff so that contact between stormwater and the landfill will be avoided.

Topical Issue 6: Hydrogeologic Relationship between Sunshine Canyon and the San Fernando Valley Groundwater Basin

Questions have been raised regarding the hydrogeologic connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin.

Topical Issue 7: Groundwater Protection

Questions have been raised regarding whether the monitoring systems required for the proposed City/County Landfill would be sufficient to ensure groundwater protection.

Topical Issue 8: Landfill Liner Design

Concerns have been raised that the proposed design for the landfill liner system would not provide sufficient protection against the degradation of existing groundwater resources.

Topical Issue 9: Leachate Generation, Collection and Treatment

Concerns have been raised that the proposed City/County Landfill would result in substantial leachate generation, which could result in surface or groundwater contamination.

Topical Issue 10: Sensitive Biological Habitats

Statements have been made that the removal of Venturan coastal sage scrub at the site would result in unavoidable significant impacts on endangered and sensitive animal species.

Topical Issue 11: Oak Trees and Douglas Fir Trees

Questions have been raised regarding why the project proponent would perform offsite rather than onsite big-cone Douglas fir and oak tree mitigation for those resources that would be disturbed within Sunshine Canyon.

Topical Issue 12: Wetlands

Questions have been raised regarding why the project proponent would perform offsite rather than onsite wetlands mitigation for impacts on resources that would be disturbed within Sunshine Canyon.

Topical Issue 13: Closure of Existing Inactive City Landfill

Questions have been raised regarding the required closure of the existing inactive City Landfill and revegetation activities.

Topical Issue 14: Noise

Concerns have been raised that the proposed City/County Landfill operations would create significant noise impacts on sensitive receptors within the area.

Topical Issue 15: Land Use

Comments have been made that the proposed City/County Landfill would not be consistent with the Granada Hills-Knollwood Community Plan.

Topical Issue 16: Hazardous Materials

Concerns have been raised that the proposed City/County Landfill would have the potential to accept hazardous waste materials, thereby resulting in risk-of-upset conditions.

Topical Issue 17: Vector Prevention and Control

Comments have been made that the proposed City/County Landfill would attract vectors and spread disease and litter offsite.

Topical Issue 18: Litter Control

Comments have been made that the proposed City/County Landfill would result in substantial litter generation beyond the project site boundary and within the adjacent community.

Topical Issue 19: Traffic Conditions at Landfill Entrance

Comments have been made that the proposed City/County Landfill would result in unacceptable level of service (LOS) conditions on San Fernando Road during the morning and evening peak hours. In addition, it has been suggested that the proposed project would result in unsafe turning movements on San Fernando Road at the landfill entrance.

Topical Issue 20: Planned Haul Routes

Comments have been made that waste-hauling vehicles traveling to and from the proposed project would adversely impact the local circulation system, including Balboa Boulevard.

Topical Issue 21: Fire Prevention and Control

Concerns have been raised that the proposed project could create a major fire that could spread into the adjacent community.

Topical Issue 22: Compatibility with Residential Uses

Concerns have been raised regarding the proximity of the site to residential uses.

Topical Issue 23: Immediate Combined City/County Landfill Operations Alternative

Questions have been raised regarding which of the alternatives considered in the Draft SEIR would be the environmentally superior alternative.

Topical Issue 24: Request for General Plan Amendment/Zone Change

Questions have been raised regarding the project proponent's request for a General Plan Amendment/Zone Change for the proposed project. Additional information regarding the proposed City/County Landfill's consistency with the Granada Hills-Knollwood Community Plan can be found in Topical Issue 15.

Topical Issue 25: Performance of a Health Risk Assessment

Comments have been made regarding the need to prepare a health study vs. a health risk assessment for the proposed project. Additional information regarding the revisions in the Final SEIR with respect to air quality data can be found in Topical Issue 27.

Topical Issue 26: Alleged Zoning Violations and Related Variance Revocation Proceedings

Comments have been made regarding the alleged zoning violations and the variance revocation proceedings when the City Landfill was in operation.

Topical Issue 27: Revised Air Quality Data

Comments have been made regarding the revisions in the Final SEIR with respect to air quality data. Additional information regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills can be found in Topical Issue 3.

Topical Issue 28: Working Arrangement Between the City and County

Comments have been made regarding the working arrangement that would be necessary between the City and County.

Topical Issue 29: Liner System and its Ability to Withstand Earthquakes

Concerns have been raised regarding the proposed liner system and its ability to withstand significant earthquakes. Additional information regarding the design of the proposed landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems can be found in Topical Issue 1. Additional information regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake and the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake can be found in Topical Issue 2.

Topical Issue 30: Request for Additional Open Space Dedication

Concerns were raised in written comments from the public hearing regarding the purported inadequacy of open space surrounding the site. Additionally, certain areas were proposed for acquisition and preservation as open space.

2.0 RESPONSES TO COMMENTS

2.1 Introduction

Both verbal and written comments received during the public hearing (October 29, 1998) and subsequent written comments received by City staff (October 30 through December 3, 1998) are responded to within this section. Verbal comments received as testimony have been alphabetically arranged by the name of the commenter and responded to in Section 2.3 within this document. Section 2.4 provides responses to written comments received during the public hearing on October 29 and Section 2.5 provides responses to written comments received after the close of the public hearing through December 3, 1998.

To the extent applicable, the verbal and written comments received during/after the public hearing (October 29, 1998) are responded to by the following topical issue responses, which are enhancements or additions to the topical responses included within the certifiable Final SEIR.

2.2 Topical Issue Responses

In the course of reviewing and responding to the written comments on the Draft SEIR, the Key-Group Meeting for this proposed project, and the recent public hearing regarding the General Plan Amendment/Zone Change, certain topical issues emerged more than once and are addressed here in responses to comments for the decisionmakers to consider during their deliberations on the proposed project. Also, specific areas of concern are summarized at the beginning of each Topical Issue with responses to those issues.

Topical Issue 1: Seismicity

Questions have been raised regarding the design of the proposed City/County Landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems.

Response:

Two east-west trending, eastward-plunging folds were mapped within the site area and are shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. The Oat Mountain Syncline lies in the southern portion of the site, adjacent to the Pico Anticline, which lies to the north. The coincidental occurrence of inclined rocks and steep topography has resulted in dip-slope conditions (e.g., a slope of the land surface that is roughly parallel to the dip of the underlying rocks) within Sunshine Canyon. In the main canyon of the project site, a dip-slope condition exists for north-facing slopes, while in adjacent canyons to the south, dip-slope conditions exist on south-facing slopes. The varying orientations of the dip slopes are a result of the broad anticlinal fold that traverses the northern and central portions of the project site.

The Sunshine Canyon City/County Landfill will be designed to the same stringent standards as the Sunshine Canyon County Extension Landfill and the City of Los Angeles Lopez Canyon Landfill. The Sunshine Canyon County Extension Landfill design was subject to intense scrutiny by a battery of experts, including peer review by other consultants and was found to be able to resist the "Maximum Credible Earthquake" which is the maximum anticipated earthquake given the currently known tectonic framework. The Lopez Canyon Landfill liner system withstood the Northridge earthquake with no damage. Due to the more

favorable topography of the City/County site, the resistance to strong shaking will be comparable to if not greater than that of the Lopez Canyon facility (See Topical Issue 2, below for further discussion of landfill stability during Northridge Earthquake).

With respect to ground faulting, detailed studies indicate that no active faults have ruptured the ground surface at the project site in at least 11,000 years, the time frame specified in USEPA and California regulations as necessary to consider a fault not active.

Several inactive faults in the vicinity of the project site have been mapped by various consulting geologists.^{1/} The orientations and direction of movement of the inactive faults on the project site, as well as their proximity to the Santa Susana thrust fault system, suggest that they all may be related tectonically. A group of faults with a northeasterly trend is clustered in the southeastern portion of the project site. These faults are delineated by offset beds and the faulted contact between the Towsley and Pico Formations, and were shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. Another group of faults lies in the northern portion of the site as shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. The northern fault traces have an east-west trend. The proximity of the three northern fault traces indicate that they may, in part, be the same fault. These faults were mapped by different geologists^{2/} and may have been located slightly in error between various authors' maps (Richard B. Saul, State Geologist, personal communication). The longest fault trace in the northern part of the site was examined closely by Geolabs (1981). It reported the fault to be gently northward dipping with features indicative of both large-scale and minor reverse-slip offsets. The fault becomes a bedding-plane fault in a westward direction. There is no evidence to indicate that this fault is active.

Professional geologists conducted a trenching investigation in 1982 in addition to a seismic survey at several localities along the fault trace and determined that the fault is not active.^{3/} When these trenches were open, exposing the fault plane, independent inspection by a private consulting geologist (formerly of the State Water Resources Control Board [SWRCB]) and a geologist from the California Division of Mines and Geology (CDMG) also determined that the suspected fault showed no evidence of being active (Dr. Alvin L. Franks, Consulting Geologist, written communication, 1982; Richard B. Saul, State Geologist, written communication, 1982).^{4/}

^{1/} *Geology of Southeastern Ventura Basin, Los Angeles County, California*, U.S. Geological Survey Professional Paper 334-H, E.L. Winterer and D.L. Durham, pp. 275-336, 1962. *Geologic Map of the San Fernando Earthquake Area*, A.G. Barrows, J.E. Kahle, R.B. Saul, and F.H. Weber Jr., in *San Fernando, California, Earthquake of 9 February 1971*: California Department of Conservation, Division of Mines and Geology Bulletin 196, Plate 2, ed. G.B. Oakshott, 1975a. *Geology of the S.E. 1/4, Oat Mountain Quadrangle, Los Angeles County, California*, Richard B. Saul, California Department of Conservation, Division of Mines and Geology, Map Sheet 30, 1979; *Preliminary Geotechnical Feasibility Study - Proposed Class I Disposal Site, Los Angeles, California*, Geolabs, unpublished report, February 1981.

^{2/} *Geologic Map of the San Fernando Earthquake Area*, op. cit.; and *Preliminary Geotechnical Feasibility Study - Proposed Class I Disposal Site, Los Angeles, California*, op. cit.

^{3/} *Sunshine Canyon Project Reflection/Refraction Seismic Survey*, Gasch and Associates. 1982.

^{4/} *FEIR Sunshine Canyon Landfill Extension, Appendices*, Volume IIA, Ultrasystems Engineers & Constructors, Inc., Appendix B, Geology Technical Report, Exploratory Boring and Trench Logs, p. 11. April 1989.

All of the fault traces found on the project site are not traceable across streambed alluvium where they cross gullies, indicating that they are at least older than those deposits. In addition, no other features indicative of recent faulting (e.g., fault scarps or offset structures) were detected from field investigations and detailed analyses of aerial photographs. The deformation that produced the folds and faults within the site area may have taken place during the mid-Pleistocene period (750,000 to 125,000 years ago). The local geologic features that formed during the Pleistocene deformation include the Pico Anticline, Oat Mountain Syncline, and most or all of the mapped faults on the site.^{5/} The overall east-west trends of the resulting geomorphic features were produced by north-south crustal shortening.

Figure 4.1-5 in the Draft SEIR depicts regional earthquake faults, and Figure 4.1-6 shows the tectonic setting of the project site. Active and potentially active faults that have the potential to generate significant strong ground motions at the site include the Santa Susana, San Fernando-Sierra Madre, San Gabriel, and Northridge Blind Thrust Faults in the near field (less than 6 miles from the site); the Simi-Santa Rosa, Oakridge, Elysian Park, and Malibu Coast-Santa Monica-Raymond Faults in the midfield (between 6 and 20 miles from the site); and the Whittier-North Elsinore and San Andreas Faults in the far field (greater than 20 miles from the site). The most important of these sources with respect to the intensity of strong ground motions at the site are the Santa Susana, San Fernando-Sierra Madre, and Northridge Blind Thrust Faults near field sources, and the San Andreas far-field source.

The San Fernando-Sierra Madre Fault, with a site-to-source distance of 3.0 miles and the closest fault to the project site, was the source of the 1971 San Fernando earthquake (Magnitude [M] 6.6). This fault stretches approximately 52 miles along the base of the San Gabriel Mountains from the vicinity of the Newhall Pass southeasterly toward San Bernardino. The northwestern end of this fault ruptured in 1971. Ground rupture associated with the San Fernando earthquake of 1971 is known to have occurred throughout the San Fernando Valley region. Two such occurrences lie east of the project site across San Fernando Road and the I-5 Freeway. Offsets of between 2.4 to 3.9 inches were detected after this event. For this reason, the most recent version of the Alquist-Priolo Special Study Zone (SSZ) map (Oat Mountain Quadrangle, 1976) had extended the SSZ boundaries westward into the Sunshine Canyon site; and were depicted on Figures 4.1-4 and 4.1-7 in the Draft SEIR. However, studies by consulting geologists in 1982 and 1988 and inspections by independent geologists all concur that there is no evidence of active faulting onsite. It is also significant to note that neither of the faults located across the I-5 Freeway, easterly of the project site (showing movement in the 1971 earthquake event), were found to displace the alluvium in the San Fernando Pass area, suggesting that they do not extend onto Sunshine Canyon. Additionally, the landfill sustained no physical damage in 1971 as a result of that earthquake.^{6/}

The Santa Susana Fault is a steeply dipping thrust fault that passes beneath the site at a depth of between 3.1 and 6.2 miles. The shortest distance between the ground surface at the project site and the Santa Susana Fault is approximately 3.1 miles. This is referred to as the "site-to-source" distance used in evaluating the intensity of ground motions expected at the site should an earthquake occur on the Santa Susana Fault. The fault stretches approximately 17 miles from the edge of the San Gabriel Mountains, where it interacts with

^{5/} "Geology of the Southwest Slope of the Santa Susana Mountains and Geologic Effects of the San Fernando Earthquake," Richard B. Saul in *San Fernando, California Earthquake of February 1971*, California Department of Conservation, Division of Mines and Geology Bulletin 196, ed. G.B. Oakshott. 1975.

^{6/} *FEIR Sunshine Canyon Landfill Extension, Appendices*, Volume IIA, Appendix B, Geology Technical Report, Exploratory Boring and Trench Logs, op. cit., p. 10.

the San Fernando-Sierra Madre Fault, westward into Ventura County. The Santa Susana Fault is a complex structure with numerous strands mapped by field investigators. The eastern edge of the Santa Susana Fault, where it interacts with the San Fernando-Sierra Madre Fault, was active during and following the 1971 San Fernando earthquake, and that fault may have been the source of the 1893 Pico Canyon earthquake (Yeats, 1987). Yeats et al. (1993) divided the fault into three discrete segments, each of which could rupture independently.

The San Gabriel Fault, with a site-to-source distance of approximately 5 miles, is the closest major fault (capable of an earthquake of M 7.0 or greater) to the site. Regional geologic studies of the San Gabriel Fault led to the conclusion that it is the ancestral segment of the San Andreas Fault within the Transverse Ranges. Although abandoned as the primary dislocation between plate boundaries in Pliocene time, offset geologic units indicate right lateral slip on the order of 0.6 mile within Quaternary time. Evidence of dip slip is also documented but is likely only localized. The fault trace extends for approximately 45 miles and is capable of generating up to M 7.0 earthquakes. The CDMG has suggested the San Gabriel Fault may also be a possible source of the 1893 Pico Canyon earthquake.

Seismic hazards that must be considered at the Sunshine Canyon site include primary fault rupture, secondary ground rupture, and strong ground shaking.

Based on the above cited data, the potential for primary fault rupture within the boundaries of Sunshine Canyon is considered minimal. The faults that intersect the ground surface onsite do not display evidence of Holocene movement (e.g., within the last 11,000 years), indicating they are inactive. One relatively major inactive fault has been exposed to date during excavation for the County Landfill. This inactive fault, located in the ridge between the northwest and north canyons, was recognized and shown on site geologic maps prior to landfill development. These site geologic maps do not indicate that any major inactive faults would be exposed during construction of the proposed City/County Landfill. However, all excavations would be mapped by a professional geologist, and any inactive faults encountered during excavation would be recognized and shown on site geologic maps. Additionally, the mapped geology would be field checked by a Los Angeles Regional Water Quality Control Board (LARWQCB) geologist prior to placement of any engineered fill or liner in the excavated areas. Based on observations of ground rupture in the vicinity of the I-5/SR-14 Freeway interchange following the San Fernando earthquake (1971), the Alquist-Priolo SSZ demarcating the 1971 fault rupture extends west across the I-5 Freeway and onto the project site at its northern extremity and was shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. However, extensive field investigation, including geologic mapping and logging of exploratory trenches by both consulting geologists and CDMG representatives, indicates that fault rupture from the 1971 San Fernando earthquake did not occur within the boundary of the project site and that known fault traces within the site boundaries show positive evidence that there has not been fault displacement onsite in Holocene time.

No analytical methods are available to estimate either the potential of occurrence of secondary ground rupture or its magnitude. Therefore, for design purposes, the potential for secondary ground rupture in the epicentral region (the area above the buried fault plane) must be evaluated by comparison to observations of past earthquakes. Based on the observations of secondary ground rupture in the Northridge earthquake, vertical displacements due to secondary ground rupture on the order of 4 to 8 inches could occur within Sunshine Canyon in the event of a major earthquake on a thrust fault underlying the site.

The design of a landfill above a thrust fault accommodates the ground deformation associated with thrusting (i.e., development of folds and fractures). This is referred to as secondary ground rupture. In comparison

with other types of faults, design models for predicting the effects of thrust faults are somewhat different. Thrust faults are neither more nor less dangerous than other types of faults with respect to the integrity of the liner and environmental control systems.

Seismic activity occurring in the site vicinity can produce strong ground shaking, which could result in damage to the landfill waste containment system, due to seismically induced displacement of the waste mass; if these systems were designed, engineered, or installed incorrectly. Strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment and surface water control systems. Landfill containment systems are broadly defined in this respect to include the liner, cover, leachate collection and removal system (LCRS), and gas extraction system. Surface water drainage systems include drainage channels, down drains on slopes, and sedimentation/stormwater retention basins. Seismic design of the landfill system includes providing mitigation for landslide potential by appropriate grading of the waste mass and natural slopes, designing the containment system to resist the effects of strong shaking, providing an emergency response plan to mitigate damage to containment systems that may occur (e.g., cracking of pipes or drainage channels, loss of power), and providing redundant systems where damage is not readily observable or repairable (e.g., use of a composite liner system).

In summary, no cumulative impacts for seismic exposure are anticipated. No primary fault rupture or significant slope displacement due to strong ground motions is expected. It is not anticipated that the landfill would create seismic-related risks to other local area land uses. Nonetheless, a regional earthquake of high magnitude could temporarily impact landfilling operations and other projects in the regional area; however, any disruption to the proposed landfill facility (e.g., cracked concrete lining of drainage structures, broken gas collection pipes, power loss, office building damage) will be repaired immediately by the project proponent.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.1.4, Geologic Hazards-Seismicity, pp. 4-40 and 4-41, no significant impacts would occur. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 2: Landfill Stability During Northridge Earthquake

Questions have been raised regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake. Additionally, the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake have been questioned.

Response:

The Northridge earthquake occurred on January 17, 1994 (at 4:30 a.m. local time), and the main shock of the earthquake was centered near Northridge. This event was assessed by the University of California at Berkeley seismographic station to have a moment magnitude (M_w) of 6.7. Damage resulting from the earthquake was widespread within Los Angeles County. Damage in the epicentral region included the

collapse of highway structures, damaged and/or destroyed residential and commercial structures, widespread disruption of utilities and other facilities, and numerous landslides.^{7/}

The performance of Class III nonhazardous landfills in the Southern California area affected by the earthquake was excellent. Several landfill facilities were subjected to peak bedrock accelerations of 0.2 to over 0.5 g. No landfills affected by the Northridge earthquake showed any physical signs of major instability, although several facilities experienced minor levels of lateral deformation and/or cracking at the surface. Additionally, many landfills experienced a temporary shutdown of their gas flare systems due to the loss of power after the earthquake.^{8/}

At the inactive landfill in the City, longitudinal cracks were observed along the top of the waste fill where it interfaces with the natural canyon walls. These cracks varied in width from less than 0.8 inch to as much as 12 inches wide, exhibiting in some areas 6 to 12 inches of differential vertical offset. This cracking did not appear to represent any threat of overall instability to the integrity of the landfill. Instead, cracking may have been caused by the differential settlement of the waste fill itself, which occurred as a result of the earthquake shaking.^{9/} During this period, the landfill gas (LFG) extraction system was temporarily shut down due to a loss of power. Power to the LFG collection and flaring system was restored 2 days after this seismic event. No damage to the landfill's ancillary structures resulted.

Detailed landslide mapping from aerial photographs by the U.S. Geological Survey (USGS, 1995b) indicated that no significant earthquake-induced landslides occurred at the project site. However, the USGS map does show several small landslides within the footprint of the approved County Landfill (this landfill was not operational at the time); generally located in steep canyons adjacent to the major drainage area. In addition, a relatively concentrated accumulation of landslides occurred along the south-facing slopes of Aliso Canyon, south of the project site. This is consistent with previous postearthquake reconnaissance surveys of Sunshine Canyon where several small earthquake-induced or reactivated landslides were observed in both County and City areas of the project site. Several rockfalls occurred on steep bedrock cliffs, including one located within the ±100 acre open-space area, south of the inactive City Landfill.

The Northridge earthquake produced no significant adverse impacts on the proposed project site. No cracking or deformation in the waste mass was found at the base of the existing inactive landfill by consulting geotechnical engineers or the University of California at Berkeley's reconnaissance team. The minor cracking observed was limited to the landfill's surface cover area, and no waste was exposed. This cracking was repaired immediately by placing additional cover material over the cracks. Similarly, no significant seismically induced displacement was observed in the natural slopes surrounding the existing inactive landfill.

The performance of the existing landfill in the Northridge earthquake and observations of the performance of other solid waste landfills in major earthquakes indicate that solid waste is extremely resistant to the

^{7/} *Preliminary Report on the Principal Geotechnical Aspects of the January 17, 1994, Northridge Earthquake*, eds. Jonathan P. Stewart, Jonathan D. Bray, Raymond B. Seed, and Nicholas Sitar, University of California at Berkeley, Earthquake Engineering Research Center Report No. UCB/EERC, p. 1. June 1994.

^{8/} *Ibid.*, p. 200.

^{9/} *Ibid.*, p. 218.

effects of strong ground motions and is not susceptible to loss of strength or large internal displacements due to earthquake shaking (as is the case for some earthen materials, e.g., loose, saturated sand). Therefore, the waste mass of the existing landfill and solid waste placed within the proposed fill areas is expected to perform well when subjected to strong shaking from earthquakes, with no loss of strength and little internal deformation.

In regard to other solid waste landfills after the Northridge earthquake, cracks were observed in all waste cells of the Chiquita Canyon Landfill. Tears were also discovered in the landfill liner. They were caused by a combination of factors, including stress concentrations and inadequate shear resistance at the base of the landfill. The tears occurred adjacent to an anchor trench at the crest of a slope where the largest static (preseismic) stresses in the high-density polyethylene (HDPE) geomembrane would be expected as a result of the settlement and compaction of the waste fill. This is generally recognized as one of the locations where the stress on the liner is the greatest. The tear initiated from the corner of a rectangular "cutout" where a quality assurance/quality control (QA/QC) sample was collected during construction for destructive testing. Rectangular holes in the liner are points of stress concentration. A smooth liner was used at the base of the landfill, providing inadequate shear resistance to restrain the base from sliding, thereby resulting in a large deformation. Several feet of sliding displacement at the base resulted in slumping along the side slope, and additional stress was applied to the liner in the vicinity of the rectangular cutout. For additional information, refer to the Draft SEIR, Appendix C16, Assessment of the Performance of Class III Nonhazardous Solid Waste Landfills in Recent Earthquakes.

The Lopez Canyon Landfill liner system performed extremely well during the Northridge earthquake and sustained no damage despite being subjected to stronger shaking than the Chiquita Canyon Landfill. A similar liner design for the Sunshine Canyon County Landfill was used. Measures used in the design of the Lopez Canyon Landfill liner system that prevented rupture or tearing of the liner system included anchor trenches used above or outside (laterally) of the waste for temporary anchorage and abandoned whenever the landfill was expanded laterally or vertically, no destructive samples collected within 5 feet of the crest or toe of a slope or an anchor trench, and a textured liner at the base of the landfill to limit permanent seismic displacement to less than 12 inches. Similar design methods would be incorporated for the City/County Landfill. For additional information, refer to the Draft SEIR, Appendix C16, Assessment of the Performance of Class III Nonhazardous Solid Waste Landfills in Recent Earthquakes.

Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions

Concerns have been raised regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills.

Response:

The discussion of local wind patterns was included in the Draft SEIR in accordance with data provided in *A Climatological Air Quality Profile, California South Coast Air Basin (SCAB)* (South Coast Air Quality Management District [SCAQMD], January 1980), as well as data and methodology provided in the *CEQA Air Quality Handbook* (SCAQMD, April 1993).

As stated in the Draft SEIR, Section 4.2.2, California's SCAB Regional Climate Conditions, p. 4-47, during the winter months the project area experiences a frequent wind flow from the north and northwest through

the Newhall Pass into the western San Fernando Valley. These winds predominate between 11:00 a.m. through 5:00 p.m. The speeds (16.5 mph average in the Newhall Pass) reflect the influence of Santa Ana winds, which are strongest during those hours of the day and blow in a similar direction. Onsite measurement has shown the overall average wind speed to be 9.9 mph with a maximum 1-hour measurement of 45 mph. It should be noted that the overall average wind speed and maximum 1-hour wind speed do not preclude the presence of very low or high wind speeds, especially during Santa Ana conditions.

The National Weather Service's description of Santa Ana winds includes the following:

Santa Ana winds are generally defined as warm, dry winds that blow from the east or northeast (offshore). These winds occur below the passes and canyons of the coastal ranges of Southern California and in the Los Angeles Basin. Santa Ana winds often blow with exceptional speed in the Santa Ana Canyon (the canyon from which it derives its name). Forecasters at the National Weather Service in Oxnard and San Diego usually place speed minimums on these winds and reserve the use of "Santa Ana" for winds greater than 25 knots (or approximately 29 mph).

The complex topography of Southern California combined with various atmospheric conditions create numerous scenarios that may cause widespread or isolated Santa Ana events. Commonly, Santa Ana winds develop when a region of high pressure builds over the great basin (the high plateau east of the Sierra Mountains and west of the Rocky Mountains including most of Nevada and Utah). Clockwise circulation around the center of this high pressure area forces air downslope from the high plateau. The air warms as it descends toward the California coast at the rate of 5 degrees Fahrenheit per 1,000 feet due to compressional heating. Thus, compressional heating provides the primary source of warming. The air is dry since it originated in the desert, and it dries out even more as it is heated.

Santa Ana winds commonly occur between October and February with December having the highest frequency of events. Summer events are rare. Wind speeds are typically north to east at 35 (approximately 40 mph) knots through and below passes and canyons with gusts to 50 knots (approximately 58 mph). Stronger Santa Ana winds can have gusts greater than 60 knots (approximately 69 mph) over widespread areas and gusts greater than 100 knots (approximately 115 mph) in favored areas. Frequently, the strongest winds in the Basin occur during the night and morning hours due to the absence of a sea breeze. The sea breeze which typically blows onshore daily, can moderate the Santa Ana winds during the late morning and afternoon hours.^{10/}

Dust from construction activities, including physical site disturbance, material deliveries, employee commuting, and potential wind erosion during high wind episodes, may create a visual and soiling nuisance beyond the property line. Because dust impacts are expected to be significant during the construction phase, standard mitigation measures (by project design) will be implemented to control fugitive dust emissions during construction as required by SCAQMD Rules 402 (Nuisance) and 403 (Fugitive Dust).

^{10/} "Santa Ana Winds." www.nimbo.wrh.noaa.gov/sandiego/sanwind.htm; INTERNET.

In addition, fugitive dust emissions in combination with PM_{10} emissions generated from vehicular exhaust are anticipated to create a significant impact. Past operations have shown that the higher-elevation upper plateau and southern berm areas of the existing inactive landfill have experienced greater wind-generated fugitive dust occurrences than the lower elevations within the canyon. However, the project proponent has successfully implemented enhanced soil treatment measures to stabilize soil conditions and further enhance onsite revegetation.

In addition, fugitive dust emissions in combination with particulate matter less than 10 microns in diameter (PM_{10}), generated from vehicular exhaust, are anticipated to create a significant impact.

The closest residential area in the community of Granada Hills to the proposed landfill footprint would be approximately 1,700 feet away (with the exception of several residential trailers located about 7010 feet east of the project site). During high wind events, monitoring of weather conditions is conducted by BFI personnel stationed in the existing environmental control center. Weather information is conveyed by radio transmission from environmental control system personnel to the BFI foreman and the onsite construction contractors and/or operating personnel. The BFI foreman has control over construction activities and landfilling operations, and he has the authority to cease construction activities and/or close the landfill if warranted.

It should be noted that the Applicant will also use soil sealant which has been proven to effectively control fugitive dust emissions. The soil sealant is a nonpetroleum, high-bonding-strength emulsion developed specifically for dust and erosion control. Selected fractions of natural tree resins are combined into a strong and versatile bonding agent. The soil sealant is a biocatalyst formulation designed to improve the resistance to erosive forces of traffic and weather. The soil sealant is supplied as a highly concentrated liquid catalyst and applied in dilute water solutions.

The soil sealant treatment enables water to rapidly wet and penetrate soils. Treatment of soil materials facilitates the achievement of the highest density possible with available compaction effort. The soil sealant increases cohesion of water with soil and between soil agglomerates. Improved bonding of water with soil during construction retards evaporation and reduces the volume of water required for compaction. Increased cohesion in soil and aggregate mixtures makes them easier to process and handle with construction equipment and reduces segregation problems. The soil sealant increases density in compacted soils and aggregate mixtures over that achieved when working only with water. The soil sealant treatment directs an alignment of soil particles and soil agglomerates during processing and compaction that cures into a structure with increased density, cementation, and bearing strength. Unpaved surfaces are hardened against the abrasive effects of traffic and against the erosive effects of wind and water.

Water trucks are currently used to apply soil sealant at the project site. The soil sealant solution is blended into the soil and standard depths of treatment range from 6 to 12 inches. Thorough mixing and blending are essential to ensure uniform dispersion of the solution. A grader would be used to manipulate the mixture until it is uniformly wetted and blended. Compaction is essential for the effectiveness of the soil sealant treatment. After soil is blended to an optimum moisture content with the soil sealant solution, a compactor would be used to thoroughly compact the treated material. Perimeter drainage would be provided to maximize water flow off of and away from the stabilized area.

The soil sealant requires no special safety precautions in handling or storage and will not harm personnel or equipment. The soil sealant is supplied as a liquid concentrate in 55-gallon sealed plastic drums. The sealant is both nonhazardous and nonflammable.

The following mitigation measures will reduce fugitive dust emissions during construction activities at the project site:

- Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and control is required.
- Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.
- Graded areas shall be watered as necessary to reduce dust emissions.
- Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation plan. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.

The following mitigation measures will reduce fugitive dust emissions during operational activities at the project site:

For truck travel and fugitive dust emissions, mitigation shall include:

- To minimize fugitive dust emissions, the access roadways shall be paved as necessary and haul roads to the working face areas shall be hard packed and/or covered with gravel a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.

For paved roads, mitigation shall include:

- Curbs and gutters will be used..
- At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice-daily cleaning, a control efficiency in excess of 90 percent is predicted.

For unpaved clay roads, mitigation shall include:

- An SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas during windy periods. Note that this control efficiency is less than (i.e., more conservative than) the 95 percent value used at the El Sobrante Landfill (Draft South Coast Air Quality Management District Consultation No.

4, Work in Progress Air Quality Analysis Refinements El Sobrante Landfill Expansion, TRC Environmental Solutions, Inc., May 2, 1997).

For unpaved crushed stone covered roads, mitigation shall include:

- With the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.
- The regular application of an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency of 80 percent shall be applied and subsequent watering.

Mitigation pertaining to heavy equipment operations shall include the following:

- Operations shall be restricted to encompass no more than a 10-acre active working face area.
- To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.

Additionally, mitigation pertaining to site erosion shall include the following:

- Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.
- A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.
- An SCAQMD -approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.

With the implementation of the above-referenced mitigation measures for the proposed City/County Landfill, significant impacts from fugitive dust emissions would be substantially reduced.

In addition, refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality and Appendix D4, Revisions to Draft SEIR, Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary, in this document.

Topical Issue 4: Landfill Gas Generation and Odor Control

Concerns have been raised that the proposed City/County Landfill would generate substantial volumes of LFG, resulting in the potential for odor migration onto sensitive land uses.

Response:

Odors can occur when the landfill surface, due to differential waste settlement, subsidence, or cracks, allows the LFG to escape into the atmosphere. At the existing inactive City Landfill, cracks found on the landfill surface are filled as part of a continuous maintenance program. A similar procedure would be performed at the proposed landfill footprint area.

The proposed LFG collection and flaring system would be installed to collect gases generated by the decomposition of refuse through a series of horizontal and vertical gas collector wells designed to minimize the potential of onsite and offsite gas emissions and odors. The proposed LFG collection and disposal system will consist of gas extraction wells and piping. This system will be constructed of polyethylene pipe, which will flex as differential settlement occurs at the landfill. Once LFG is generated, it will be drawn into the horizontal collectors or wells and subsequently to the collection piping system by the vacuum blowers. To avoid drawing air into the system, the gas is extracted at the same rate it is being produced by controlling the vacuum level in the piping system. Extraction wells will be spaced so that the volume of refuse influenced by the wells is sufficiently balanced to capture the maximum amount of gas being generated by the landfill. The wells will be located so that the area of well influence will slightly overlap that of the adjoining wells. Furthermore, the collection system piping would be sized so that sufficient vacuum is available to all wells in the system (see Draft SEIR, Figure 2.7-7).

The horizontal gas collection system will be installed when preparing each new cell area and will be expanded as necessary to ensure compliance with SCAQMD Rule 1150.1 (Control of Gaseous Emissions from Active Landfills).

The monitoring of surface and ambient air quality is a continuous process required by the SCAQMD throughout the site life of the landfill and during its closure and postclosure maintenance period. Both the LFG collection and flaring system and sampling program for the proposed landfill will require approval by the SCAQMD. Surface sampling is used to identify areas of the landfill where gas may be escaping.

With respect to odors, the landfill must not be a source of odor nuisance per the requirements of CCR, Title 27, §20919. The project proponent would prepare and implement an odor abatement program, which would be approved by the designated City of Los Angeles Local Enforcement Agency (City LEA). The program would ensure that odor levels within the facility are kept within baseline odor standards and that odors emanating from the facility would not exceed any odor detection thresholds at the property boundaries. The best method for ensuring that there will be no odor generation is by proper compaction and coverage of all solid waste materials by the end of the working day. Refuse received at the proposed landfill would be properly disposed within one hour of receipt, compacted, and covered with a minimum layer of 6 inches (i.e., State standard) of compacted soil cover material or an approved alternative daily cover by the end of the working day; therefore, the potential for odors is substantially reduced. The odors that may be released directly from the refuse prior to being covered with cover material are usually at low levels and are dispersed in the atmosphere at levels of concentration below which they do not create a nuisance to local receptors. The proposed landfilling operations are located at sufficient distances from the potential receptors

(residential) and separated by sufficient terrain; so that no odor nuisance from refuse emplacement should occur.

No "Notices of Violation" have ever been issued by the AQMD at either the inactive City Landfill or the currently operating County Landfill. The AQMD indicated that the inactive City Landfill was not the source of previous resident odor complaints when it was in operation during the late 1980s, and that the primary odor source was from naturally occurring sulfur and existing oil well and gas injection storage operations at Aliso and Cascade Oil Fields. Existing odor control procedures used onsite at the County Landfill are effective in controlling refuse odors.

The following mitigation measures would be implemented as part of a comprehensive odor control program:

- The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.
- Operational techniques shall be used to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.
- Solid waste shall be compacted within 1 hour of its arrival at the working face.
- The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.
- If an odor problem should develop, appropriate control measures shall be implemented. These measures include applying daily cover material or more frequent application of the cover material to seal the landfill surface, or making adjustments to the wells, equipment, and operation of the LFG collection and recovery system.
- To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include:
 - Sample Probe Installation: At a minimum, one monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils.

- Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 parts per million (ppm).
- Ambient Air Samples: Twenty-four-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.
- Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane; at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.
- Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.
- LFG flaring systems shall be sited as required by the SCAQMD and constructed using best available control technology (BACT). The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City LEA. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.

With the implementation of City Mitigation Measures in the Draft SEIR, Section 4.2.13, Odor Impacts, pp. 4-94 through 4-96, no significant impacts from odors would occur.

Topical Issue 5: Stormwater Runoff Control Measures

Questions have been raised regarding the project proponent's ability to control and contain stormwater runoff so that contact between stormwater and the landfill will be avoided.

Response:

Implementation of the proposed project would result in a net change (or diversion) to existing drainage patterns, hydrologic conditions, and quantities within the site through alterations to the site topography. However, alterations to and discharges from the project site will be minimal due to implementation of surface water control measures. Construction grading and the removal of surficial vegetation would remove existing barriers that currently act to dissipate (i.e., slow down and reduce) stormwater runoff from the site. As a result, if surface water control measures are not implemented, the proposed project has the potential to increase the stormwater runoff and peak discharge, increase erosion and sediment transport, and decrease surface water quality due to increased sediment loads. The recommended mitigation measures provided in the Draft SEIR, pp. 4-113 and 4-114, require the project proponent to make improvements consisting of surface water drainage channels, interceptor ditches, pipelines, and sedimentation basins. These proposed features will collect, direct, and safely convey stormwater runoff around the landfill site and route runoff into regulated sedimentation basins. Figure 4.3-2 of the Draft SEIR shows the proposed site drainage plan.

Moreover, these features will be designed and constructed to minimize ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping.

CCR, Title 27, §20260 requires that drainage and sediment control structures (e.g., sedimentation basins) for landfill sites be designed to handle, at a minimum, a 100-year-frequency, 24-hour storm event. The proposed City/County Landfill will be designed to accommodate a 100-year storm event. Specifically, the sedimentation basins will handle sediment and debris flow, settle out suspended soil particles, prevent silting of the downstream channel, and maintain the natural watercourse. Sedimentation basins will be located outside of proposed landfill filling areas. These basins will also diminish surface water discharges from the site so as to not exceed the pre-development or pre-landfill peak discharge rate.

Drainage from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Stormwater runoff flows from tributary channels, and erosion caused by these flows converges at the canyon's mouth. Currently, stormwater from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Water that collects in that basin is periodically monitored under the stormwater monitoring plan for the operational County Landfill. Drainage from this basin travels southerly into a wash before reaching the mouth of the canyon near the landfill entrance.

Offsite, stormwater from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City Department of Public Works, Bureau of Engineering (City BOE). The culvert is approximately 120 feet long and releases stormwater into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, stormwater enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County Department of Public Works (DPW), Hydrology and Water Conservation Division. Stormwater then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the U.S. Army Corps of Engineers (Corps).

The inactive City Landfill has numerous drainage control features, such as benches, interceptor ditches, and concrete drainage channels (see Draft SEIR, Figure 4.3-2), to divert stormwater runoff away from the landfill. These control improvements are maintained regularly and closely monitored during the rainy season so that any necessary repairs or maintenance can be performed in an expeditious manner. Areas of ponding or erosion damage on the existing inactive landfill are repaired upon discovery and as weather permits.

To minimize potential stormwater quality impacts, the project proponent will request coverage under the General National Pollutant Discharge Elimination System (NPDES) permit from the LARWQCB for nonpoint-source stormwater runoff. The NPDES permit regulates general construction activities and industrial activities. In general, the NPDES permit application would describe the landfill, type and quantity of wastes expected, effluent and receiving water limitations, pretreatment requirements, and monitoring programs. This permit is intended to eliminate nonstormwater discharge to existing stormwater systems, implement a water pollution prevention plan and monitoring program, and require monitoring of discharges into the localized stormwater system.

The potential exists for nonstormwater discharges into the stormwater conveyance systems. Various control measures and features described in the Draft SEIR will be used to separate stormwater from wastes being disposed of in the proposed landfill and to control sediment load, debris, and erosion impacts caused by stormwater runoff. The long-term impacts associated with development and operation of the landfill could allow potential pollutant sources to be transported into local stormwater systems. These potential impacts will be minimized by properly storing all liquids (e.g., oil, antifreeze, lubricants, or diesel fuels) necessary for the operation and maintenance of landfill equipment and reducing the potential for spills. Any onsite spills will be contained in accordance with an approved spill response plan. In addition, any fertilizers or insecticides used for revegetation purposes will be stored within the plant materials center. To the greatest extent possible, the products used will be biodegradable and nontoxic.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-113 and 4-114 for stormwater runoff, no significant impacts would occur.

Topical Issue 6: Hydrogeologic Relationship between Sunshine Canyon and the San Fernando Valley Groundwater Basin

Questions have been raised regarding the hydrogeologic connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin.

Response:

The Watermaster, MWD and the Los Angeles Regional Water Quality Control Board (LARWQCB) all concur that the only hydrogeological connection between the site and the San Fernando Groundwater Basin is the alluvium in the axis of the canyon. They are also in agreement that some type of groundwater cutoff through the alluvium combined with monitoring and the engineered leachate control systems for the landfill are sufficient to mitigate potential impacts from the landfill on the San Fernando Groundwater Basin.

Data pertaining to groundwater within the Sunshine Canyon area were obtained from several prior studies of the project site and supplemented by monitoring data gathered from the monitoring well network. Borings completed at the project site have ranged in depth from 2 to 62 feet, as shown in Table 4.1.1 of the Draft SEIR. Most exploration borings and accompanying packer tests were conducted within the proposed landfill footprint area. However, several borings were purposely located outside of the landfill footprint because surface geologic features warranted further subsurface documentation. Numerous borings (C-6, C-7, C-10, C-11, and C-12) were located within unique geologic features that are known to produce higher permeabilities, such as deep-seated landslides, axis of anticlines, and ridgelines. During site exploration activities, groundwater generally was encountered in the exploratory borings (CM-1, CM-3, CM-4, CM-8, and CM-9) drilled in the canyon bottom, with one exception. Boring C-2, which was drilled to the bottom of the canyon, did not intercept groundwater. Exploratory Borings CM-3 and CM-5 do not lie in a stream gully and did encounter groundwater at depths of 40 to 50 feet. Groundwater was not encountered in the remaining exploratory borings (C-6, C-7, C-10, C-11, and C-12), although indications of previous groundwater existence were found in recovered drill core soil samples (i.e., iron and manganese staining in fractures). The borings that encountered groundwater were completed either in alluvium or colluvium where groundwater was encountered or in bedrock material, and the majority were sealed off from the near-surface alluvium and colluvium.

Groundwater at the project site generally flows in a south to southeast direction. Results of the drilling program and subsequent water level readings indicated that confined groundwater conditions may exist at numerous locations within the project site. Groundwater in the uppermost aquifer occurs under unconfined conditions in the alluvial sediments and generally under confined conditions in the top weathered zone of the Towsley Formation. The lower bedrock zone was found to occur under confined conditions. Available groundwater studies indicate that potentially limited groundwater resources lie beneath the project site.

The geologic structure works in conjunction with onsite topography to restrict groundwater movement within and down the canyon axis. With the relatively low hydraulic conductivity documented in the Towsley Formation and the hydraulic gradients at the site, groundwater velocities are low. The bedrock units are folded along the Oat Mountain syncline and the Pico anticline. To the south of the main canyon, the units generally dip to the north along the south flank of the syncline (into the main canyon), and this minimizes groundwater movement (against the dip) to the south and southeast. Northward, the bedding rolls over the Pico anticline and dips north. Along the northern side of the main canyon, the bedrock units dip to the north, and groundwater movement is not likely to be impeded by the structure.

Within Sunshine Canyon, groundwater follows the topography and moves down slopes, continuing toward the valley axis. The primary component of groundwater flow, based on the work performed onsite, is shown to be horizontal. The vertical component of flow is highly variable over the project site. In the upper portions of the canyon where recharge is likely, a downward component of flow is suspected. In the lower portion of the canyon, there is evidence of an upward component of groundwater flow direction. This upward component is also demonstrated further downstream and near the landfill entrance.

Movement of shallow groundwater follows the direction of surface drainage. Water stored in the alluvium and shallow bedrock generally flows below grade within the canyon. Based on estimates of hydraulic conductivity using soil descriptions from boring logs, the estimated groundwater discharge velocity in the alluvium ranges from approximately 0.005 to 1 foot/day. Groundwater in the bottom of the canyon flows slowly toward the mouth of Sunshine Canyon.

Due to the pervasively folded, faulted, and anisotropic nature of the bedrock (i.e., interbedded sandstone and shale), the flow rate of groundwater at the project site can vary significantly over short distances. However, the presence of nonactive faults in addition to interbeds of low-permeability shale and mudstone tends to restrict the flow of groundwater. Subsurface water in Sunshine Canyon is effectively hydraulically separated from the San Fernando Valley alluvium by the low-permeability bedrock. Groundwater flow in the bedrock is not continuous between the canyon and valley floor area.

After independently reviewing published hydrogeologic reports for the Sunshine Canyon area, the Watermaster (i.e., the Los Angeles County Superior Court appointed hydrologist who manages the withdrawal and replenishment of groundwater supplies in the adjudicated groundwater basin) for the Upper Los Angeles River Area (ULARA) concluded that, other than through the alluvium, there was no groundwater connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin. The Watermaster also concluded that the natural bedrock material underlying the canyon is of low permeability and has low storage capability. A report prepared for the City Bureau of Sanitation (BOS) on groundwater movement in Sunshine Canyon states:

Whatever groundwater movement does occur is undoubtedly complicated and slow. Complications include the bedding, which, although generally dipping towards the east

in the lower canyon, dips steeper than the hydraulic gradient making it necessary for the groundwater to move across the bedding. Interbeds of siltstone and shale act as subsurface dams with little or no permeability. Groundwater quality is poor.^{11/}

The alluvial soils within the canyon have generally been found to have a higher permeability and capability of transmitting fluids than the bedrock. In that regard and similar to the operational County Landfill, the foundation base-grade elevations for the proposed landfill would be prepared by excavating all alluvium, weathered rock, and other unsuitable foundation materials followed by the installation of several environmental protection and control systems, such as the gravel subdrain system, compacted soil foundation layer, liner system, LCRS, surface and water drainage controls, and other features. Therefore, no contact between deposited refuse and alluvial soils would occur as a result of proposed landfill development.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to Waste Discharge Requirements (WDRs), liquids can be subsequently used onsite for landscape irrigation, dust control, or other non-emergency uses.

It is anticipated that the proposed City/County Landfill would not impact imported drinking water or domestically produced drinking water (e.g., from local area wells) since the nearest spreading ground is the Hansen Spreading Ground located approximately 5 miles southeast of the project site. No impacts on this spreading ground are anticipated as a result of project development. In addition, surface water runoff from the project site is safely conveyed into the City's flood control system, which connects with the County's flood control system. No significant impacts to beneficial uses of groundwater of the San Fernando Groundwater Basin would occur as a result of the development of the proposed City/County Landfill. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 7: Groundwater Protection

Questions have been raised regarding whether the monitoring systems required for the proposed City/County Landfill would be sufficient to ensure groundwater protection.

Response:

The groundwater monitoring system has been developed to meet all current standards for water quality protection. The LARWQCB will review and approve the proposed groundwater monitoring system prior to the start of construction. Furthermore, the LARWQCB can require that additional monitoring points be added to the groundwater monitoring system anytime it feels such actions are warranted.

The LARWQCB reviews and revises WDRs for all Class III sites (including the inactive City Landfill) to ensure consistency with revised CCR, Title 23, Chapter 15, which requires upgrading of groundwater

^{11/} *Hydrology of Sunshine Canyon North Valley Landfill Site*, Robert T. Bean, Consulting Geologist. Unpublished report, July 28, 1978.

monitoring systems to identify water quality degradation. Article 5 of Chapter 15, adopted in 1991, specifies new guidelines for the siting of groundwater monitoring wells around all active landfills. In addition, the U.S. Environmental Protection Agency (USEPA) issued 40 Code of Federal Regulations (CFR), Parts 257 and 258, "Subtitle D" (or Solid Waste Disposal Facility Criteria) in 1991, which uniformly applies additional requirements to landfill operators. The LARWQCB adopted Order No. 93-062 in September 1993, which requires all regional landfills to comply with these federal regulations.^{12/} In July 1997, the above regulations were incorporated into CCR, Title 27, Chapter 3, Subchapter 3, Article 1, SWRCB-Water Quality Monitoring and Response Programs for Solid Waste Management Units.

The LARWQCB also administers the Solid Waste Assessment Test (SWAT) Program pursuant to the California Water Code (CWC) §13273, which requires owners of active or inactive nonhazardous landfills to evaluate possible migration of hazardous wastes or leachate from each facility. In addition to requiring site evaluations, the SWAT Program provides deadlines for implementation of water quality monitoring systems at active solid waste disposal sites, requires water quality monitoring systems at many closed solid waste landfill sites that previously had none, and requires identification of leaking sites for verification monitoring or remedial actions under CCR, Title 27, §20385. Upon approval by the LARWQCB, landfill operators must collect groundwater monitoring data during four consecutive quarters and submit that data in a SWAT report. SWAT reports must include an analysis of both surface and groundwater on, under, and within a 1-mile radius of the landfill site.

Currently, 22 groundwater monitoring wells are installed at the project site to monitor groundwater conditions and water quality. Both shallow and deep groundwater monitoring wells have been installed. The shallow wells are screened exclusively within alluvial material and bedrock to properly evaluate and compare groundwater quality upgradient and downgradient in similar geologic formations. Upgradient wells were installed and designed to monitor natural groundwater conditions present within the water-bearing strata. These wells are intended to supplement monitoring of groundwater conditions around the perimeter of the existing landfill and to monitor for possible offsite pollution migration. Downgradient wells (i.e., deep monitoring wells) were installed to monitor potential impacts resulting from the existing inactive landfill. Of the 22 wells installed, 13 specifically monitor groundwater downgradient from the existing landfill. The County Landfill is hydrogeologically upgradient of the existing inactive landfill.

In addition to groundwater monitoring wells, the vadose zone is also monitored. This zone is defined as the area below the landfill and above groundwater where water may be present or suspended in the weathered bedrock or soil. The presence or absence of this water has historically been monitored at the City Landfill through the use of lysimeters, which are special monitoring points designed to permit the collection of water that may be in the pores of the soil or weathered bedrock above the groundwater zone. These wells are shown in the Draft SEIR, Figure 4.3-4.

Currently, vadose zone monitoring is accomplished by four lysimeters that have been installed in the vadose zone of the existing inactive City Landfill. Quarterly monitoring records (since lysimeter installation) have indicated that no liquid can generally be collected from the lysimeters. Monitoring of the vadose zone is also conducted using a series of gas sampling probes installed around the waste mass. These probes are monitored on a monthly basis for the presence of LFG as required by the SCAQMD. One groundwater

^{12/} *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, California Regional Water Quality Control Board, Los Angeles Region (4), p. 4-10. Adopted June 13, 1994.

sample is collected in one of the probes exhibiting the highest LFG concentration, as required by the SCAQMD. Monitoring at the County Landfill is accomplished by sampling the underdrain system outfall points instead of lysimeters. For both areas, sampling is performed quarterly and findings are reported to the LARWQCB. This would also occur for the City/County Landfill.

As indicated in Topical Issue 6, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to WDRs, liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-135 and 4-136, and the design and installation of the comprehensive monitoring system (described above), no significant impacts to the beneficial groundwater uses of the San Fernando Valley Groundwater Basin would occur. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 8: Landfill Liner Design

Concerns have been raised that the proposed design for the landfill liner system would not provide sufficient protection against the degradation of existing groundwater resources.

Response:

The landfill liner system will be constructed in compliance with USEPA Subtitle D regulations. The USEPA has found that a Subtitle D liner system protects groundwater resources from municipal solid waste under all environmental conditions in the United States. Considering that the existing unlined Sunshine Canyon City Landfill has not degraded groundwater resources after over 40 years of operation, the installation of the proposed liner system in compliance with Subtitle D provides more than sufficient groundwater protection.

As stated in City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, p. 4-135, in compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, §258.40 (Design Criteria), the proposed development of the City/County Landfill would include the installation of a composite liner system. This liner system would consist of two components: (1) the upper component shall consist of a minimum 30-mil-thick flexible membrane liner (FML), and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot-thick layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is used, it would be at least 60 mils thick. If a thinner soil barrier layer of lower permeability is used, it would have equal or superior containment capability. The FML component would be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill would have an LCRS; consisting of either a minimum 1-foot-thick granular layer or a geosynthetic alternative with an equivalent flow capacity; and a minimum 2-foot-thick protective soil cover over which refuse will be placed. There would also be a protective toe berm at the landfill terminus.

In accordance with RCRA Subtitle D, 40 CFR, Part 258, the composite liner system will be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system will be described in the project proponent's Joint Technical Document (JTD) for the landfill facility. The liner systems will be constructed and field tested in accordance with strict QA/QC procedures submitted to and approved by the LARWQCB prior to construction.

Areas of natural groundwater seepage will be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains will be placed in areas where seeps and springs have been identified and will collect and convey any water from these sources to the sedimentation basin. The nature and source of the seep will be investigated including sampling and laboratory testing.

With the proper installation of the proposed liner system, no significant impacts on groundwater resources are anticipated with development of the proposed project.

The SEIR concluded that no significant impacts to beneficial uses of groundwater of the San Fernando Groundwater Basin would occur as a result of the development of the proposed landfill. To address potential environmental impacts resulting from leachate formation, the proposed landfill is mandated by State and federal laws to install a leachate collection and removal system (LCRS). The LCRS will be installed on top of the liner system in all areas of the proposed landfill footprint including side slope and waste-on-waste areas of the existing inactive City Landfill. This system will be constructed, maintained and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS will be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. A description of the components of the leachate treatment system is provided in the Draft SEIR, Section 2.7.4, Leachate Collection and Removal System, p. 2-61.

In addition to the LCRS, operational practices will be performed by the Applicant to minimize leachate generation. These include diverting stormwater runoff around the landfill, diverting surface water runoff away from active landfilling areas, minimizing the size of the landfill working face area, grading the landfill surface to provide positive surface water drainage away from active landfill areas, and applying daily, intermediate, and final cover material to minimize moisture infiltration into the waste mass. Additionally, the proposed City/County Landfill will not accept liquid wastes or wastes with high-moisture content.

It is anticipated that the design and operational characteristics of the proposed landfill, the installation of numerous environmental protection and control systems, and the continuous monitoring during landfilling operations and the closure and post-closure maintenance period will ensure the integrity of groundwater resources within Sunshine Canyon.

As discussed in Section 4.3.2 of the Draft SEIR with regard to potential offsite migration of leachate, consulting geologists have made a determination based on published literature, field hydrogeology tests, geologic mapping and water quality data, that landfilling within Sunshine Canyon would not create a significant impact on beneficial groundwaters of the San Fernando Valley Groundwater Basin.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system

is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to Waste Discharge Requirements (WDRs), liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

The proposed landfill would not impact any imported drinking water or domestically produced drinking water (e.g., from local area wells). In this regard, it should be noted that there would be no impacts on the nearest spreading ground (Hansen Spreading Ground), which is located approximately 5 miles southeast of the project site. In addition, surface water runoff from the project site is safely conveyed into the City's flood control system, which connects with the County's flood control system.

In addition to the engineering controls described above, the geologic setting of the landfill isolates it from drinking water aquifers. As discussed in the SEIR, the only hydraulic connection between the landfill site and drinking water supplies is the relatively narrow and shallow layers of alluvium along the stream channel in the axis of the canyon. This alluvium will be removed beneath the footprint of the landfill during construction, as discussed in the SEIR. The natural geologic setting has contributed significantly to the fact that landfilling activity in the canyon over the past 30+ years has not impacted drinking water supplies. Additional information regarding leachate migration from the landfill can be found in Topical Issues 6 and 7. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 9: Leachate Generation, Collection, and Treatment

Concerns have been raised that the proposed City/County Landfill would result in substantial leachate generation, which could result in surface or groundwater contamination.

Response:

The leachate collection and removal system and Subtitle D composite liner provide ample protection for groundwater from leachate. The engineered surface water control facilities and landfill operational practices mitigate the potential for leachate impacts on surface water.

The potential for leachate to form when water passes through deposited waste could occur if excess water use or water spreading for irrigation or dust control or rainfall results at the proposed landfill. Leachate generation rates are primarily dependent on the amount of liquid the waste originally contained and the quantity of precipitation that enters the landfill through the cover and falls directly into the waste. The chemical characteristics of the leachate will be affected by the biological decomposition of biodegradable organic materials, chemical oxidation processes, and dissolving organic and inorganic materials in the waste. The leachate's chemical composition will change as the proposed landfill goes through the various phases of decomposition, similar to the changes that occur in LFG production.

In order to determine the amount of leachate that the proposed City/County Landfill would generate, an engineering model called Hydrologic Evaluation of Landfill Performance (HELP) was used. HELP is a hydrologic model of water movement across, into, through, and out of the landfill. The HELP model predicted leachate quantities based on observations of empirical data and was used as the basis for a conservative design of the LCRS. That design also predicts the maximum estimates of leachate production

after closure of the proposed project.^{13/} HELP facilitates the estimation of surface runoff, drainage, and leachate production that might develop as a result of landfilling operations using a wide variety of landfill designs. The model uses climatic soil and design data to simulate the effects of hydrologic processes, including precipitation, surface storage, runoff, infiltration, percolation, evapotranspiration, soil moisture storage, and lateral drainage. A landfill system includes various combinations of vegetation, cover soils, waste cells, special drainage layers, impermeable barrier soils, synthetic membrane covers, and liners that can be modeled with HELP.

Based on local average precipitation data, combined with the assumptions of an operating landfill designed with interim covers in place, the HELP model indicated that approximately 5.2 to 9.2 inches of precipitation may percolate through the landfill in 1 year. It is anticipated that after closure, and with an engineered final cover placed on the landfill, only minimal amounts of precipitation would percolate through the landfill in 1 year.^{14/} The steeper slopes of the City/County Landfill would be built with surface drainage systems that would not be subject to significant percolation due to the rapid rate of surface water runoff. As such, the major contributor of percolation is expected to be the top deck surface area of the landfill, which is relatively flat. Preliminary design of the project site indicated that infiltration would be lessened by reducing the area of percolation in the canyon.

With regard to the long-term contamination potential of a "typical" landfill permitted to accept municipal solid waste, an extensive review of published material conclusively demonstrated that landfill leachate possesses a trend of decreasing pollution loads over time.^{15/} Observed studies show that key leachate indicators (e.g., total organic carbon, chemical oxygen demand, biological oxygen demand, and leachate concentration) substantially decrease in concentration relative to an initial value and eventually, upon landfill closure, stabilize both chemically and biodegradably.

For the proposed project, the HELP model projected the amount of leachate generation expected to occur. Additional modeling for the proposed City/County Landfill is anticipated to be performed during preparation of its ROWD. It was estimated by using the HELP model that the County Landfill had an estimated leachate production rate of 120 gallons per minute (gpm). No leachate has been detected in the groundwater monitoring wells at the County Landfill, and all extracted, treated alluvial groundwater has been approved for onsite irrigation and dust control use by the LARWQCB.

To address potential environmental impacts resulting from leachate formation, the proposed City/County Landfill is mandated by State and federal laws to install an LCRS. The LCRS will be installed on top of the liner system in all areas of the proposed landfill footprint including side -slope and waste-on-waste areas of the existing inactive City Landfill. This system will be constructed, maintained, and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS will be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover

^{13/} *Report of Disposal Site Information, Proposed Sunshine Canyon Landfill Extension Site*, Volume I, PRA Group, p. 70. August 16, 1991.

^{14/} *Ibid.*, p. 72.

^{15/} M. Reinhard, Ph.D., Stanford University. Unpublished letter to Purcell, Rhoades & Associates, December 21, 1987.

materials, and equipment used during landfilling activities. The LCRS will also be designed and constructed pursuant to 40 CFR, Part 258, and in accordance with CCR, Title 27, §20340.

The LCRS will be of the blanket type and overlay the FML, and it will collect and direct the intercepted leachate toward leachate sumps where it will be collected and removed from beneath the waste. The blanket system will be sloped toward the sumps to prevent ponding of leachate. The proposed LCRS drainage network will be designed and engineered to withstand the potential effects of seismic events. The HDPE pipe selected for the proposed LCRS drainage network will have the ability to deform (be flexible) without leakage during potentially strong earthquakes.

In addition to design features described above, operational practices will be performed by the landfill operator to minimize leachate generation. These include diverting stormwater runoff around the landfill, diverting surface water runoff away from active landfilling areas, minimizing the size of the landfill working face area, compacting disposed waste to decrease its permeability and increase its ability to shed water, grading the landfill surface away from active landfill areas, and applying daily, intermediate, and final cover material to minimize moisture infiltration into the waste mass. Additionally, the proposed City/County Landfill will not accept liquid wastes or wastes with high-moisture content (i.e., wastes containing greater than 50 percent water by weight).

Leachate collected by the LCRS would be directed by gravity to sumps and then discharged to a leachate transmission pipeline for conveyance to a storage tank at the leachate treatment facility. The flow capacity of the pipeline would exceed anticipated leachate flow rates. The leachate volume and its characteristics would be monitored closely at the storage tank by periodic sampling and analysis.

A description of the components of the leachate treatment system is provided in the Draft SEIR, Section 2.7.4, Leachate Collection and Removal System, p. 2-61. This system includes air stripping and carbon-bed filtration treatment processes. Leachate treatment processes would be conducted in accordance with applicable permit conditions of the LARWQCB.

The leachate treatment system would be similar to the one currently in place at the operational County Landfill. Recovered leachate would be pumped to a condensate holding tank. From this tank, the leachate would be air stripped and carbon bed polished to remove chemical impurities. Air stripping removes the majority of VOCs from leachate by moving air through the collected liquid. Carbon is then added to “polish” the liquid and remove any remaining low-level VOCs. Treated liquids would then be stored in one of two treated handling tanks. Effluent from the leachate treatment facility would be sampled and tested for contaminants, and a bioassay test would be conducted. After completion of these tests, if it is acceptable, treated liquids would be used for irrigation or dust control. Approval for the reuse of treated liquids at the proposed City/County Landfill would be obtained from the LARWQCB.

The project site is also located in a relatively dry area (average annual rainfall is estimated at approximately 10 inches);^{16/} a typical rainstorm has a short duration and high intensity. Rainfall would tend to run off the landfill surface and not infiltrate the surface area, minimizing the potential for leachate formation.

^{16/} Based on County Department of Public Works Oat Mountain Hydrologic Map (1969), closest 50-year isohyet (maximum 24-hour amount) located within project site boundary.

It is anticipated that the design and operational characteristics of the proposed landfill, the installation of numerous environmental protection and control systems, and the continuous monitoring during landfilling operations and the closure and postclosure maintenance period will ensure the integrity of groundwater resources within Sunshine Canyon. It is not expected that this resource would be impacted by the proposed project development.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-135 and 4-136, for leachate generation, no significant impacts would occur.

Topical Issue 10: Sensitive Biological Habitats

Statements have been made that the removal of Venturan coastal sage scrub at the site would result in unavoidable significant impacts on endangered and sensitive animal species.

Response:

The dominant natural plant community within the project site is Venturan coastal sage scrub. This community comprises 149.1 acres in the City and 10.9 acres in the County. Venturan coastal sage scrub occurs north, east, and south of the existing City Landfill on exposed slopes and is dominated by California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), thick-leaved yerba santa (*Eriodicytyon crassifolium*), black sage (*Salvia mellifera*), and white sage (*Salvia apiana*). Other plant species occurring in this community include Mexican elderberry (*Sambucus mexicana*), sudweed aster (*Lessingia filaginifolia*), pinebush (*Ericameria pinifolia*), and Our Lord's candle (*Yucca whipplei*).

This habitat is one of four sensitive habitats found within the project site. Venturan coastal sage scrub is ranked "highly threatened" by the California Natural Diversity Data Base (CNDDB) because of development pressures. The CNDDB ranks this community as S2.1, which means this community has between 21 to 100 viable occurrences or covers between 4,000 to 20,000 hectares (i.e., 9,884 to 49,420 acres) in California. In addition, high numbers of rare species are found within this community.

The development of the proposed City/County Landfill within the City portion of Sunshine Canyon would result in the direct loss of approximately 82.2 acres of Venturan coastal sage scrub habitat and resulting loss of small mammals, reptiles, amphibians, and other small animals of slow mobility. This impact is considered significant. More mobile wildlife species would be forced to move into remaining areas of open space or other habitats.

The California Department of Fish and Game (CDFG) has identified a list of Species of Special Concern (SSC). Several SSCs were located during field surveys or have the potential to occur onsite; refer to the Draft SEIR, Table 4.4-4, p. 4-159, for a status of sensitive wildlife species.

Suitable habitat exists within the Venturan coastal sage scrub habitat for the California gnatcatcher (*Poliophtila californica californica*) that is federally listed as threatened and is an SSC. The California gnatcatcher has restricted habitat requirements, consisting of coastal sage scrub dominated by coastal sagebrush; and generally occurring below 750 feet in elevation in coastal regions and below 1,500 feet in elevation in inland locations (Atwood and Boisinger, 1992). Although the species was not observed during numerous field surveys conducted onsite, the project site is located within this species' historic geographical range; consequently, the species could possibly move onsite prior to project implementation. Mitigation

measures are proposed to reduce impacts on the California gnatcatcher to a less than significant level. Surveys for the California gnatcatcher will be conducted prior to obtaining grading permits to determine the status of the species within the proposed development areas. If grading activities occur during the nesting season, a federally permitted biologist will survey areas to determine whether the species is present. If gnatcatchers are present, grading activities will cease until proper officials are notified, and additional habitat restoration or purchase of suitable offsite habitat will be required.

The existing Venturan coastal sage scrub provides suitable habitat for reptiles. The San Diego horned lizard (*Phrynosoma coronatum blainvillei*) is located within this habitat and is considered threatened. Impacts on this species are considered significant. Restoration of the coastal sage scrub habitat is proposed to mitigate impacts to a level of less than significant. Although removal of habitat will create a temporal loss of the species, it is anticipated that populations should recover following restoration. Topsoil that is friable will be selected to suit lizard habitat requirements. In addition, the coastal western whiptail (*Cnemidophorus tigris multiscutatus*) was also observed onsite. Because this species is fairly common regionally, impacts on this species are considered adverse but not significant. (Although not considered sensitive by State or federal resource agencies, it is considered locally rare in southwestern California and was recently included as a Candidate 2 species for federal listing.) Suitable habitat is also present for the silvery legless lizard (*Aneides pulchra pulchra*), considered an SSC, and the coastal rosy boa (*Lichanura trivirgata roseofusca*). Because suitable habitats are available in the vicinity of the project site, impacts on these species are considered adverse but not significant.

The removal of Venturan coastal sage scrub would also affect the following SSC bird species that were observed onsite and could potentially breed onsite: Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) and loggerhead shrike (*Lanius ludovicianus*). Because suitable habitat exists for these species in the vicinity of the project site, impacts on these species are considered adverse but not significant. The Bell's sage sparrow (*Amphispiza belli belli*) and coastal cactus wren (*Campylorhynchus brunneicapillus*) were not present onsite during breeding bird surveys conducted in 1995. Although suitable habitat is present, the potential for these species to occur onsite is low. Potential impacts on these species as a result of project implementation are considered less than significant.

Coastal sage scrub habitat also provides winter foraging habitat for the northern harrier (*Circus cyaneus*) (SSC), which was observed on the adjacent site. The prairie falcon (*Falco mexicanus*) (SSC) was also observed onsite. The golden eagle (*Aquila chrysaetos*) is a California Fully Protected Species, an SSC, and protected by the federal Bald Eagle Act. A golden eagle was observed onsite during previous field surveys. Because of the large amount of foraging habitat available for this raptor species in the vicinity of the site, impacts on raptor foraging habitat are not significant. If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey will be conducted for active nesting areas. If active nests are found, no construction activities will occur within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each nest will be fenced. Trees containing nests will only be removed during the nonbreeding season.

Proposed project mitigation includes the restoration of Venturan coastal sage scrub onsite, and this will include a detailed conceptual mitigation plan containing information on planting, maintaining, and monitoring revegetated coastal sage scrub habitat. The implementation of this plan will provide greater than a 1:1 (replacement: removal) ratio to offset loss of habitat. Surface soils and seed sources of Venturan coastal sage scrub will be gathered from areas of the project site and spread within onsite mitigation areas.

After the incorporation of the City Mitigation Measures identified in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, pp. 4-179 through 4-181, no significant impacts on endangered and sensitive animal species due to the removal of Venturan coastal sage scrub would occur.

Topical Issue 11: Oak Trees and Douglas Fir Trees

Questions have been raised regarding why the project proponent would perform offsite rather than onsite big-cone Douglas fir and oak tree mitigation for those resources that would be disturbed within Sunshine Canyon.

Response:

Both onsite and offsite planting areas are being proposed for big-cone Douglas fir and oak tree mitigation by the project proponent. The proposed project (including closure activities) would result in the direct loss of 545 coast live oak trees (*Quercus agrifolia*), 19 canyon live oak trees (*Quercus chrysolepis*), and 2.7 acres of small isolated patches of big-cone Douglas fir (*Pseudotsuga macrocarpa*) found within the proposed landfill footprint.

Direct project impacts on these resources will be mitigated to the greatest extent possible by implementing replanting programs and performing phased restoration on the landfill site. Mitigation tree planting will primarily occur within O'Melveny Park and the ±100 acre open-space area located south of the existing landfill. The open-space area is to be maintained as open space as part of the original City approval of the inactive City Landfill. Walnut and oak trees will be planted in suitable barren portions of the open-space area between the existing City Landfill and Granada Hills, O'Melveny Park, in East Canyon, and on the canyon ridge areas above the clearing limits. Sycamores and willows will be planted along Bee Canyon and East Canyon Creek. Appropriate planting locations will be selected based on soil types, steepness of the slope, and aspect (i.e., location and or direction of the sun). Mitigation measures will comply with the City's Oak Tree Ordinance.

City Mitigation Measures for the loss of oak tree resources will comply with the Los Angeles City Oak Tree Ordinance and include replanting native trees at a 2:1 (replacement:removal) ratio, consisting of 15-gallon or a 5:1 ratio of 3-gallon container trees. Mitigation trees will be planted prior to removal of impacted trees, and all mitigation trees will need to be specimen size within 1 year after tree removal. A specimen tree is defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above the ground. A total of one hundred 24-inch box and twenty-five 36-inch box size coast live oak trees shall be planted in areas identified by the City. The trees planted will be required to be in natural form. The total mitigation tree count obtained using the 5:1 replacement ratio will be reduced by 125 trees to account for the inclusion of these larger trees. To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program will be implemented. Each year, the mitigation planting will be monitored for growth and survival.

Native tree seed stock will be obtained from the onsite plant materials center (i.e., nursery). The center will include a greenhouse and shade house that will be used for the germination of native tree seed stock (e.g., coast live oak, canyon live oak, big-cone Douglas fir, sycamore, maple, and black walnut) and native vegetation gathered in and around the Sunshine Canyon area. Once germinated, these species will be used as part of the revegetation programs within Sunshine Canyon.

The existing nursery (located in the City) is recognized as one of the largest growers of coast live oak trees in the Southern California region. The project proponent, in conjunction with its consulting forester, has advanced the growing techniques for both the coast live oak and the big-cone Douglas fir tree species. A cooperative research program is established at this nursery with Oregon State University, Department of Forest Sciences. Future onsite revegetation programs that are being proposed will be established in cooperation with the City's Chief Forester (Street Tree Division). The current tree planting and mitigation program at the existing City Landfill is achieving a near 90-percent average success rate, and trees planted in the open-space area are increasing in height by 6 inches or more per month.

After the incorporation of City Mitigation Measures for Douglas firs and oak trees identified in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, pp. 4-197 and 4-198, no significant impacts on these resources would occur.

Topical Issue 12: Wetlands

Questions have been raised regarding why the project proponent would perform offsite rather than onsite wetlands mitigation for impacts on resources that would be disturbed within Sunshine Canyon.

Response

Onsite mitigation for the loss of wetlands is not practical due to unsuitable conditions for establishing both wetlands and riparian habitats. As a result of this determination, the project proponent will provide mitigation that will result in no net loss of wetland habitat.

Development of the City/County Landfill would remove both wetland and riparian habitats from the project site. It is expected that the streamzones and wetland areas located within the proposed landfill footprint and some areas external to those areas (i.e., used for ancillary facilities) would be graded, filled, or disturbed as a result of landfill development. Grading of the site would occur in phases as dictated by the need for additional landfill footprint area. Because the landfill would remain indefinitely (as a constructed fill area), wetland habitats would not be reestablished within these areas.

Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies to compensate for impacts on riparian and wetland resources. These sites include Bull Creek, Bee Canyon, and East Canyon, which are located either adjacent to or in proximity to the project site. If neither of these potential candidate sites are available, the project proponent will purchase wetland credit through an established mitigation bank (one that is already established by a developer, public, nonprofit, or private entity) in consultation with regulatory agencies as compensatory mitigation for impacts on wetland and riparian resources.

After the incorporation of City Mitigation Measures for wetlands identified within the Draft SEIR, Section 4.4.2, Wetlands and Riparian Habitat, pp. 4-189 through 4-191, no significant impacts on this resource would occur.

Topical Issue 13: Closure of Existing Inactive City Landfill

Questions have been raised regarding the required closure of the existing inactive City Landfill and revegetation activities.

Response

Closure of the inactive Sunshine Canyon City landfill is taking place as soon as possible. BFI is currently waiting for regulatory approval of the final Closure Plan. Once the final Closure Plan is approved, BFI will commence final design and closure construction and revegetation activities. Pursuant to CCR, Title 27, §21090, as part of landfill closure, final cover is required to be placed on a landfill's top slopes, side slopes, and bench areas.

The proposed final cover for closure of the existing inactive City Landfill, consists of a monolithic soil final cover layer relying on evapotranspiration and unsaturated permeability to control water infiltration. The monolithic final cover would be revegetated to provide evapotranspiration and long-term erosion control caused by potential surface water runoff. When revegetated, a permanent grass and legume cover will provide an effective means to control fugitive dust emissions. Selected plant species would be chosen for rapid establishment. Due to the existing terrain, the seed mix chosen would be comprised of shallow-rooted (less than 12 inches) drought- and pH-tolerant plants. Native and nonnative seed mix would be applied. It is anticipated that the vegetation cover soil would eventually evolve into a mosaic of shrubs interspersed with annual grasslands. Once established, selected plant species are intended to be self-propagating and not require excessive irrigation or long-term maintenance.

To ensure successful revegetation, a 3-year revegetation monitoring and maintenance program would be implemented. Periodically, revegetated areas would be monitored for growth and survival rates. A maintenance and monitoring program would be implemented during the 30-year postclosure maintenance period.

A ±100 acre open-space area is located southeast of the existing inactive landfill within the City jurisdiction. This area is maintained as open space and will be enhanced by the project proponent with additional natural vegetation to promote wildlife in this area. Appropriate planting locations will be selected within this area based on soils, slope steepness, and aspect. The external abutting slopes and peaks of the inactive landfill site will remain undisturbed. The upper portions of the ridgeline (i.e., 50 vertical feet below the ridgeline) will also be left undisturbed. The upper perimeter ridges of the inactive City Landfill will be planted with native trees (following the approval of the final closure and postclosure maintenance plan [FCPMP] by the City LEA) in order to minimize visibility of the inactive landfill and proposed City/County Landfill. The permanent revegetation of the inactive City Landfill cannot feasibly be undertaken until all responsible government agencies, including the City LEA, have approved the FCPMP. An application for closure was filed prior to ceasing operations in September, 1991, but City litigation challenging the County's approval of landfilling within the County portion of Sunshine Canyon effectively halted the City's processing of that plan for nearly four years. Since the settlement of that case, the City has been processing the plan.

For the proposed project, the Applicant proposes that the City/County Landfill would be planted with a variety of trees, shrubs, and grasslands to provide wildlife habitats. As operating landfill areas are completed, it is proposed that the finished slope will be covered with both amended soil and recycled green waste material. These materials will be placed on the front surfaces of slopes after they have received an impermeable seal. As soils are added, amendments would be included to balance any unsuitable characteristics such as acidity (pH). Fertilizers would be added at the time of soil placement and continued as part of the project proponent's ongoing maintenance program. This soil cover will provide rooting material for the final vegetation. The project proponent also proposes that revegetation would take place concurrently with filling operations as the landfill progresses up the canyon; only the active filling areas and

other operational areas of landfill would not be vegetated. The remainder of the inactive disturbed areas onsite would be planted with either temporary vegetation (on areas that remain inactive for a period longer than 180 days) or permanent vegetation.

Revegetation of slopes and fill areas with appropriate native flora will be accomplished to support local fauna. As part of the proposed revegetation plan, the reestablishment of vegetation will focus on using native species from local seed sources. Nonnative species may be used only if it is approved by the consulting biologists for areas where quick cover or a nurse crop is needed and would be removed later if appropriate. Replacement cover material will be obtained from within Sunshine Canyon to retain soil composition compatible with native flora and leave the surrounding topography undisturbed.

Topical Issue 14: Noise

Concerns have been raised that the proposed City/County Landfill operations would create significant noise impacts on sensitive receptors within the area.

Response

During construction, the nearest residential unit (located 1,700 feet southwest of the nearest point of the construction area onsite) would be exposed to a noise level of 54 decibels on an A-weighted scale (dBA) when construction is at the closest point. Because the existing ambient noise level near the closest receptor is 52.4 dBA, a construction noise increase to 54 dBA at that location would not be a perceptible audible increase and therefore is not significant. In 1995, noise readings were taken at five different locations in proximity to the landfill to determine existing ambient noise levels. The proposed City/County Landfill would not significantly impact existing ambient noise levels at any of the selected noise reading locations.

With the incorporation of City Mitigation Measures for noise identified in the Draft SEIR, Section 4.5.2, Operational Noise Impacts, p. 4-220, no significant impacts would occur.

The noise generated from landfiling operations is expected to be similar to the noise produced during construction activities because construction and landfiling activities would use the same types of equipment. The noise emanating from the inactive City Landfill (associated with routine maintenance) is not audible to the residential developments located south of the project site unless the maintenance equipment is operating near the top deck area of this landfill. All operational activity related to the proposed project would take place within the boundaries of the project site and well below existing perimeter ridgelines. Therefore, any sound emanating from landfiling operations would be effectively blocked by the existing landfill, intervening terrain, and the existing landscaped berm near the ±100 acre open-space area. Any landfill operation noise that may be audible at the trailers located across from the landfill entrance would be attenuated by the extended distance and masked by existing noise from the I-5 Freeway, railroad, and wood-chopping business. Therefore, any potential new noise sources associated with landfill operations would be from increased truck traffic proximal to the trailers.

It is not reasonably foreseeable that blasting would be used as part of the proposed landfill, although methods of excavating earthen materials can vary with encountered field conditions. As stated in the Draft SEIR, Section 2.6.3, City/County Landfill Design, p. 2-50, various excavation methods would be used to achieve foundation base-grade elevations. The specific methods would be a function of the soil type encountered or bedrock material expected to be excavated. Conventional construction equipment, such as an excavator,

wheeled loaders, dozers, and scrapers, would be utilized. The project site would be excavated within the limit lines and base of excavation contours of the proposed landfill footprint to obtain materials for a proper foundation for the landfill liner. However, if blasting is used due to the unforeseen conditions of extremely hard rock, appropriate permits will be obtained from City departments and charge densities would be selected so that resulting noise levels from blasting would not exceed 70dB.

Any additional increases in traffic-generated noise would be largely masked by traffic traveling on the I-5 Freeway. Ambient noise increase due to the proposed project near the trailers located across San Fernando Road is only projected to increase by about 1 dBA. When additional ambient noises are considered (e.g., the railroad and existing firewood chopping operation), the community noise equivalent level (CNEL) increase would be further reduced. Based on the presented significance criteria (i.e., City Noise Ordinance), a noise impact is considered significant when it exceeds a 3-dBA CNEL increase; therefore, project-generated traffic would not result in a significant noise increase at this location.

With the incorporation of City Mitigation Measures for noise identified in the Draft SEIR, Section 4.5.2, Operational Noise Impacts, p. 4-220, no significant impacts would occur.

Topical Issue 15: Land Use

Comments have been made that the proposed City/County Landfill would not be consistent with the Granada Hills-Knollwood Community Plan.

Response

Development of the proposed City/County Landfill would require an amendment to the *Granada Hills-Knollwood Community Plan* from Open Space to Heavy Industrial and a zone change from A1-1-O to M3-1-O. The ±100 acre open-space area would remain under its current land use and zoning designation of Open Space and A1-1-O, respectively. A portion of the proposed City/County Landfill, comprising ±42 acres, is already authorized in the County portion of Sunshine Canyon under existing County General Plan and zoning designations. The majority of acreage within the City portion of Sunshine Canyon is substantially disturbed from previous landfilling operations that occurred from 1958 to 1991.

Development of the proposed City/County Landfill would have minimal impacts on adjacent land uses. The operational County Landfill is located northwest of the proposed landfill footprint area. Other surrounding uses include open space to the north and west, gas storage fields to the west, an oil field to the southwest, and several freeways to the north and east of the project site. The nearest residential dwelling in Granada Hills is located approximately 1,700 feet from the proposed landfill footprint area. An existing ridgeline and a ±100 acre open-space area separate these uses. The existing perimeter ridgeline separates O'Melveny Park to the southwest, effectively blocking views from ground-level, park-related uses. Trailers and industrial uses located across San Fernando Road to the east are 700 feet from the proposed landfill footprint area. These uses would not have views of proposed landfill operations.

In addition, landfill operations would be regularly monitored by City, State, regional, and federal agencies for compliance with conditions of approval. There is a caretaker onsite 24 hours a day, and the telephone numbers of the District Manager of the landfill and SCAQMD are posted to immediately resolve any concerns due to landfill operations.

Following the direction of City staff, the project proponent is pursuing a General Plan Amendment/Zone Change (GPA/ZC) to accommodate the operation of a landfill facility (except in the ±100 acre open-space area as discussed above). Maintaining the current Open Space designation the project site would be inconsistent with future heavy-construction activities that must occur as part of State-mandated closure and postclosure maintenance (and the implementation of the FCPMP) of the existing inactive City Landfill. In addition, maintaining the *Granada Hills-Knollwood Community Plan* Open Space designation for the site would not be compatible with the adjoining operational County Landfill. Implementation of a GPA/ZC would also remedy these existing inconsistencies.

Several of the *Granada Hills-Knollwood Community Plan* objectives would be achieved through designating a facility to provide disposal capacity to meet the needs of the City's population and by preserving the ridgelines that surround the landfill (e.g., objectives 1, 2, 7, 8, and 10). The *Citywide General Plan Framework* recognizes the City's limited landfill capacity and calls for the development of more facilities to handle this need. The proposed landfill would help satisfy this need and meet the Element's infrastructure and public services goals by providing adequate disposal capacity for the necessary disposal of mixed solid waste that cannot be reduced, recycled or composted, ensuring an environmentally sound and cost-effective solid waste management system, creating job opportunities, and preserving the existing perimeter ridgelines (e.g., goals 3A, 3F, 6A, 9F, 9G, and 9H). In addition, development of the proposed City/County Landfill would conform to the landfill siting criteria stated in the *City-Collected Refuse Disposal Plan* and solid waste provisions of the *Open Space Plan*.

The proposed landfill would also implement the solid waste management goals and policies of the City and County of Los Angeles by providing needed solid waste disposal capacity within the County. These solid waste management plans include *Solid Waste Management Status and Disposal Options in Los Angeles County*, *Los Angeles County Solid Waste Management Action Plan*, *City of Los Angeles Solid Waste Management Action Plan*, *City of Los Angeles Solid Waste Management Plan*, *City of Los Angeles Solid Waste Management Policy Plan*, *City of Los Angeles Source Reduction and Recycling Element*, *Integrated Solid Waste Management System for Los Angeles County*, *Los Angeles County Source Reduction and Recycling Element*, *Los Angeles County Countywide Integrated Waste Management Plan*, and *Los Angeles County Countywide Siting Element*.

In particular, the proposed landfill would satisfy objectives of the City's October 1993 *Phase IV Report, Solid Waste Management Policy Plan*. In Chapter 6 of that Plan, Objective 3.3 regarding Disposal Facilities calls for the City to:

... identify, evaluate, and secure by the year 2000 adequate disposal capacity to accommodate projected waste requiring disposal to the year 2020 with an optional reserve capacity in the year 2020 for 20 years of additional disposal.

To achieve this objective, the Plan presents three policies to secure adequate disposal capacity: a policy of Local Disposal, Remote Disposal, and Other Disposal Methods. The Remote Disposal policy calls for the transportation of City waste, either by rail or truck, to remote locations in Riverside, San Bernadino and Imperial counties, provided such disposal is environmentally safe, technically feasible, and publicly acceptable. The policy for pursuing Other Disposal Methods states that although several have been evaluated, none appear feasible due to implementation, environmental or financial issues. The remaining policy for achieving the Plan's objective, the policy for Local Disposal, calls for the City to work closely with the County, other jurisdictions and private firms to identify and secure additional disposal capacity in

and/or outside the county to meet the City's needs. This policy recognizes that even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated in the City. By the year 2000, no public or private landfills will be operating within the City (with the possible exception of the Bradley Landfill for two-three years); and by 2006, four of the remaining Class III landfills in the Los Angeles region are expected to close or reach capacity. Recognizing that the siting of landfills is extremely difficult, the policy also provides that the City will look to the expansion of existing landfills, in addition to working with the County to jointly develop landfill capacity:

- ***Expansion of Existing Landfills.*** Four landfills in the Los Angeles area that accept City-generated waste have the potential for expansion: Lopez Canyon, Bradley West, Chiquita Canyon and Sunshine Canyon. . . . The City will continue to monitor the expansion efforts of these landfills quarterly and reevaluate their potential use for disposal of City-generated waste. (*Phase IV Report, Solid Waste Management Policy Plan pages 6-6 - 6-7*)

However, the current status of the three landfills mentioned in this policy other than Sunshine Canyon as having the potential for expansion leaves few options for achieving the City's goal. The County's June 1997 *Countywide Siting Element (CSE)* reveals the following status:

Lopez Canyon. This City-owned landfill, located in Lake View Terrace, had accepted up to 4,000 tpd of solid waste, but ceased operation in June 1996.

Bradley West. This landfill, located in the Tujunga area, was granted a variance by the City in July 1996 to increase its daily permitted waste intake from 7,000 to 10,000 tpd. During 1995, this facility had an average disposal intake of 4,604 tpd. The landfill is currently accepting approximately 7,000 tpd of waste, and it is projected to reach full capacity in the year 2000. (*CSE page 3-18*)

Chiquita Canyon. This landfill is located in the northwestern Santa Clarita Valley in an unincorporated portion of Los Angeles County. On February 25, 1997, the landfill's CUP was modified to allow for a landfill expansion to occur on 229 acres and provide a total of 23 million tons of disposal capacity. The operator is limited to a maximum daily disposal intake of 5,000 tons per day, six days per week, and the facility has a life expectancy of about 12 years based on this maximum rate. (*CSE page 7-18*)

Topical Issue 16: Hazardous Materials

Comments have been raised that the proposed City/County Landfill would have the potential to accept hazardous waste materials, thereby, resulting in risk-of-upset conditions.

Response

The proposed project will be operated as a Class III nonhazardous municipal solid waste landfill facility. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility. The project proponent will implement a hazardous waste load-checking program at the project site

similar to the program that currently exists at the operational County Landfill. This program will include employees visually inspecting incoming waste-hauling loads at the scale house area and using remote television monitors to inspect incoming rolloff-type loads and open-top vehicles. Radiation-detecting devices and sensors capable of detecting VOCs will also be used at the scale house area to prevent the unauthorized disposal of hazardous waste materials.

Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill. Solid waste would be unloaded in a segregated (isolated) area of the landfill site for visual inspection. For each load inspected, the following information will be recorded by the landfill employees: (1) date and time of load check, (2) name and telephone number of hauling firm, (3) license plate number of vehicle, (4) driver's name and license number, (5) source and type of waste, and (6) the type and amounts of any hazardous wastes found. Workers trained to identify hazardous waste materials will inspect the unloaded wastes to see if they contain any hazardous wastes.

During random load checks, unacceptable wastes that are safe to handle will be picked out of the waste stream and placed in a sealed holding bin that is currently located adjacent to the landfill access road south of the scale facilities. Material from this bin will be removed by a contracted hazardous waste hauler and replaced with an empty, sealed bin. If a hazardous waste that may pose a serious risk to facility workers or the public or if unidentifiable material (that may be hazardous) is discovered during random load checking by one of the spotters at the active working face, the area will be immediately cordoned off. The spotter will immediately notify a landfill supervisor via the use of a two-way radio, telephone, pager, or visual/verbal contact. A landfill supervisor will have the vehicle driver detained and inform the LEA inspector assigned to the landfill. In addition, the supervisor will call the California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC), to correctly identify the material and, if necessary, take preventive steps to guarantee the highest level of safety.

If the duty officer at the DTSC states that the material is safe to handle, the refuse will be removed and temporarily stored onsite. The project operator will obtain an identification number from Cal-EPA. All containers used for storage of hazardous waste material will be clearly marked to indicate the date of waste accumulation. A label will be placed on all nonstationary containers in which hazardous wastes are stored.

If the material has the potential to pose a serious threat to facility workers, waste haulers, or the public (e.g., radioactive or acutely hazardous material), the immediate project area will be evacuated, and a contracted hazardous waste hauler will be called to remove the material from the project site and transport it to a permitted Class I hazardous waste landfill. The landfill supervisor will then inform the City of Los Angeles Police Department (LAPD) and the County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, so that proper criminal action can be taken. In addition, the City of Los Angeles Fire Department (LAFD), City of Los Angeles Department of Environmental Affairs, and the LARWQCB will be informed of the incident and all necessary reports completed.

The County Landfill operation currently has signs at the landfill entrance informing waste haulers that the facility is designated as a Class III nonhazardous municipal solid waste landfill site. Signs inform waste haulers of the rules and regulations governing the disposal of hazardous waste.

It is expected that small amounts of household hazardous waste (HHW) would remain undetected and be disposed of at the proposed landfill. These wastes are generally inadvertently mixed in with residential solid wastes by residential customers. However, it should be noted that approximately 46 percent of all refuse entering the project site would be delivered via transfer trucks. These transfer trucks would haul residual (i.e., nonrecyclable) waste materials from transfer stations/material recovery facilities (MRFs). All transfer stations/MRFs have existing load-checking programs in place. At these facilities, HHW, if found, is manually sorted and picked out of the waste stream and disposed of properly. In some cases, this material can be recycled.

For those HHWs that are landfilled, environmental control systems (e.g., landfill liner, LCRS, and leachate treatment) will reduce this potential risk-of-upset conditions to a less than significant level. It is expected that any trace contaminants in the LCRS will be collected and removed through that system.

With the incorporation of City Mitigation Measures for hazardous materials identified in the Draft SEIR, Section 4.9.1, Hazardous Materials, pp. 4-296 and 4-297, no significant impacts would occur.

Topical Issue 17: Vector Prevention and Control

Comments have been raised that the proposed City/County Landfill would attract vectors and spread disease and litter offsite.

Response

The proposed City/County Landfill has the potential to attract several different types of vectors to the project site. Certain types of vectors, such as rodents and insects, can be transported to the site via collection vehicles or self-haul trucks. Generally, the materials in curbside collection vehicles are continuously compacted prior to disposal at any facility, thus reducing live rodents. The residual solid waste materials from transfer stations/MRFs are also densely compacted into transfer trucks. These trucks are either enclosed or tarped prior to transport. General compaction densities would inhibit vector migration and destroy some existing vectors.

Effective operational procedures and quality assurance will be provided by the project proponent to ensure that the proper coverage of landfilled waste materials will be performed on a daily basis, similar to the existing County Landfill vector control practices. All waste materials brought to the site will be unloaded at an active working face area, compacted, tarped, or covered with at least 9 inches of clean soil by the end of the working day. Refuse will be compacted within 1 hour of placement to approximately 1,400 pounds per cubic yard (cu. yd.). At this refuse density, potential food source or habitation for vectors will be significantly reduced.

Many items that would be stored and used at the landfill facilities (e.g., administrative and employee ancillary buildings) have the potential to attract vectors (e.g., food, seed, office supplies). These items will be stored in closed containers and within an enclosed structure. Containers will be inspected routinely and cleaned regularly to reduce vector attraction. In addition, insect breeding will be minimized by preventing the ponding of surface water at the project site.

By following such procedures, the project proponent will ensure that potential food sources for common scavenging birds, such as pigeons, crows, and sea gulls, will not result in potential impacts, such as food and

other wastes being carried to nearby properties, as well as deposited feathers and excrement that could potentially support ticks, mites, lice, and fleas.

Additionally, flies will not create nuisances at the proposed green waste and wood waste recycling area. The Los Angeles County Sanitation Districts conducted a fly vector investigation using shredded green waste as daily cover during a short-term evaluation at the Scholl Canyon Landfill. This study was designed to evaluate whether green waste attracts or deters flies. Results of the study indicated that shredded green waste does not attract flies. With respect to the proposed project, all source-separated green and wood wastes proposed for acceptance at the project site will be processed within 24 hours by landfill personnel. This waste type (if approved) will be used as alternative daily cover material at the landfill working faces or tarped at the end of the day and subsequently used as soil amendment material for landfill revegetation, erosion prevention, and weed abatement programs.

All buildings, paved surfaces, landscaped areas, and perimeter areas will be inspected regularly for signs of vector activity. Any structural defects will be repaired following discovery or during routine maintenance inspections. This will help prevent the intrusion of any ground-dwelling rodents. Additionally, both landfill operations and onsite ancillary facilities will be inspected routinely by the LEA.

With the incorporation of City Mitigation Measures for vectors identified in the Draft SEIR, Section 4.9.2, Vectors, pp. 4-300 and 4-301, no significant impacts would occur.

Topical Issue 18: Litter Control

Comments have been made that the proposed City/County Landfill would result in substantial litter generation beyond the project site boundary and within the adjacent community.

Response

Solid waste landfills have the potential to generate high volumes of litter. Litter generation can result in potential nuisance or aesthetic impacts. Sources of litter associated with operation of a landfill facility include waste materials blown from or dropped by refuse hauling vehicles, litter blown from the active working face by the wind or by the movement of landfill equipment, and unauthorized or illegal dumping. Generally, illegal dumping occurs throughout the City and County and primarily in rural or open space areas. In the past, illegal dumping has occurred in proximity to the project site along Foothill Boulevard, within the community of Sylmar.

Because the project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions could potentially transport litter offsite. The strongest winds generated within this area are during short-term episodes of Santa Ana wind conditions. During high wind conditions, the project site manager will designate confined and shielded portions of the landfill for disposal.

Currently, for the operational County Landfill, the project proponent uses an extensive litter control program with specific preventive and response measures to control windblown litter and debris onsite and, if necessary, within the vicinity of the landfill site. These measures include placing waste materials within confined working face areas, using proper compaction techniques and daily cover material, using portable litter fences adjacent to the daily operating area, and installing a 25-foot-high secondary litter fence along the southern boundary of the landfill's perimeter. In addition, the project proponent provides cleanup along

San Fernando Road and its frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard, and within O'Melveny Park.

Once a week, or more frequently if required, the project proponent mobilizes cleanup crews to provide litter control pickup in areas surrounding the landfill site. These areas include O'Melveny Park, areas along Balboa Boulevard and San Fernando Road, and other areas in proximity to the landfill. In addition, and on a daily basis, landfill employees inspect the areas immediately adjacent to the landfill site to pick up litter, if necessary. Enforcement of litter control practices at the operational County Landfill is under the authority of the County of Los Angeles, Department of Health Services (County LEA).

Vehicles transporting waste loads to the project site that are not covered, as required by law, are also a contributor of onsite litter at the project site and within the general vicinity of the project area. Currently, haulers with uncovered waste loads are informed at the scale house area that all future waste loads must be tarped and covered. If a specific refuse hauler continues to bring solid waste to the project site in vehicles that are not fully covered, the project proponent has the option to refuse delivery of the load and will impose fines and/or surcharges upon the violating waste-hauling company.

Drivers of waste-hauling vehicles who violate the mandated tarping requirement are given a notice by the project proponent that states the following requirement:

TARPING VEHICLE CODE REQUIREMENT: The following tarping vehicle code will be enforced at the Sunshine Canyon Landfill. First offenders will be warned a second time, and multiple offenders will be fined \$100.00 per offense.

Additionally, in accordance with the California Vehicle Code (CVC), §23114(a), no vehicle shall be driven or moved on any highway unless the vehicle is constructed, covered, or loaded to prevent any of its contents from dropping, shifting, leaking, blowing, spilling, or otherwise escaping from the vehicle. In addition, CVC, §23115 states that no vehicle loaded with garbage, swill, cans, bottles, wastepapers, ashes, refuse, trash, or rubbish; or any noisome, nauseous, or offensive matter; or anything transported to a dump site for disposal shall be driven or moved upon any highway unless the load is totally covered in a manner that will prevent any part of the load from spilling from the vehicle.

Large-volume customers currently comply with these requirements at the operating County Landfill. If these large-volume customers do not comply, there is a mechanism (via their existing contract) to enforce a fine(s). Also, the project proponent is presently working with the County LEA to encourage small-volume haulers to use proper tarping.

The proposed City/County Landfill will incorporate litter control measures similar to those described above for the operational County Landfill. Since the County Landfill became operational in August 1996, mitigation measures have effectively prevented fugitive litter migration off of the property. The potential for litter migration into O'Melveny Park or residential areas within Granada Hills is very unlikely; due to existing topographic features and the separation distance from the working face areas to these areas. However, should fugitive litter reach these areas, the landfill's litter control crew will be dispatched immediately to clean up any migrating litter from the landfill project.

With the incorporation of City Mitigation Measures for litter identified in the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306, no significant impacts would occur.

Topical Issue 19: Traffic Conditions at Landfill Entrance

Comments have been made that the proposed City/County Landfill would result in unacceptable level of service (LOS) conditions on San Fernando Road during the morning and evening peak hours. In addition, it has been suggested that the proposed project would result in unsafe turning movements on San Fernando Road at the landfill entrance.

Response:

The improvements recommended at the landfill entrance on San Fernando Road, listed in the Draft SEIR, Table 4.13-9, p. 4-372, will mitigate the impacts of the proposed project traffic at this location to a less than significant level. The San Fernando Road/Project Driveway intersection is expected to operate at LOS C during both the a.m. and p.m. peak hours with the implementation of the recommended mitigation measures.

In addition, intersection improvements have been made to the landfill entrance (adjacent to San Fernando Road) as a result of developing the County Landfill. These improvements were required pursuant to the adopted CUP for the County Landfill. Improvements were also authorized under a "B" permit granted by the City BOE. In this regard, a signal at San Fernando Road and the landfill entrance was installed in mid-1998, and it has alleviated any potential safety concerns resulting from truck traffic entering or exiting the project site, as well as improving access to the landfill.

Topical Issue 20: Planned Haul Routes

Comments have been made that waste-hauling vehicles traveling to and from the proposed project would adversely impact the local circulation system, including Balboa Boulevard.

Response:

Regional access to the project site is provided via the following freeway systems: Antelope Valley (SR-14), Foothill (I-210), Simi Valley-San Fernando Valley (SR-118), Golden State (I-5), and San Diego (I-405) Freeways.

Immediate ingress to and egress from the project site are provided via San Fernando Road. Project-generated traffic is expected to use the following local area roadways in proximity to the site: Sepulveda Boulevard, Roxford Street, Balboa Boulevard (limited use only), Foothill Boulevard, and Yarnell Street. All traffic will enter the project site via San Fernando Road from one of the eight main access routes, including (1) north along the I-5 Freeway, (2) south along SR-14, (3) west along the I-210 Freeway, (4) southeast along the I-5 Freeway, (5) north along the I-405 Freeway, (6) east and west along the SR-118 Freeway, (7) north on San Fernando Road, and (8) north on Balboa Boulevard to San Fernando Road (this route is restricted to light vehicles only [weighing less than 6 tons], except for refuse collection vehicles that serve the local communities).^{17/}

The Draft SEIR, Section 4.13.1, Traffic, p. 4-348, identifies the general distribution pattern for the proposed City/County Landfill. The vast majority of daily traffic generated by the landfill would be truck traffic

^{17/} City Ordinance No. 161,201.

(approximately 94 percent truck traffic, 6 percent from employee-related vehicles). Project-generated traffic was distributed and assigned to the local area system based on expected origins and destinations of the refuse truck traffic. Because the project is envisioned to serve the local and regional area, the following distribution patterns are assumed for traffic distribution and generation:

- ▶ Twelve percent of the project-related traffic is expected to be distributed north of the project site on the I-5 Freeway (10 percent) and Sierra Highway (2 percent).
- ▶ Sixty-eight percent is expected to be oriented to the south on the I-5 Freeway (45 percent), San Fernando Road (21 percent), and Balboa Boulevard (2 percent).
- ▶ Twenty percent is expected to be distributed east of the site on the I-210 Freeway (5 percent), Foothill Boulevard (5 percent), and Roxford Street (10 percent).

Generally, three types of trucks would be used to transport refuse to the project site: transfer trucks that bring in materials from transfer stations, curbside collection trucks that obtain wastes from the local collection routes, and pickup and small stakebed trucks that are primarily used by private contractors to bring in refuse (such as gardening and landscaping green wastes). Each type of vehicle is described below.

Transfer Trucks: Generally, wastes transported in transfer trucks would comprise about 46 percent of the refuse brought to the project site. These trucks would be received from the BLT Enterprise Central Los Angeles, Santa Monica, Beverly Hills, Culver City, and Falcon (Wilmington) transfer stations. An average round trip is estimated at 54 miles.

Curbside Collection Trucks: The proposed project would also have collection vehicles transporting refuse to the project site. It is anticipated that curbside collection vehicles from the communities of Granada Hills, Chatsworth, West San Fernando, Encino, and numerous west Los Angeles cities (e.g., Santa Monica, Culver City, Beverly Hills, and Inglewood) would transport refuse to the site. These vehicles would transport about 52 percent of the waste brought to the project

Local Deliveries: Local deliveries include the use of small pickups (0.75- to 1.5-ton load capacity) and stakebed trucks. Generally, these vehicles would collect and transport landscaping material, green wastes, and wood wastes. These deliveries comprise less than 2 percent of the total vehicle trips to the project site.

The Draft SEIR and Appendix B1 summarize the trip generation forecasts for the proposed project in the City. Using the standard passenger car equivalent (“PCE”) factors of 3:1 for transfer trucks and 2:1 for curbside collection trucks, the proposed project would generate a total of 2,260 PCE trips, with 245 produced during the a.m. peak hour and 285 generated during the p.m. peak hour. The approved County Landfill, which is considered a “related” project in the SEIR, would generate 3,820 daily PCE trips, with 405 trips occurring during the a.m. peak hour and 480 during the p.m. peak hour. As for residential streets located in Granada Hills, refuse collection trucks serving the adjacent Granada Hills community use those streets only during collection periods, on trash pick-up days, and Balboa Boulevard has a 6,000-pound truck restriction south of San Fernando Road.

Mitigation measures that would reduce cumulative impacts resulting from development of the proposed project are identified in Table 4.13-9 (Revised) in this document. These measures are intended to offset the cumulative impacts due to project implementation. The Draft SEIR, Table 4.13-7, p. 4-369, Column 5, 1998

w/Mitigation, depicts the expected volume-to-capacity (V/C) and LOS values for the impacted intersections after implementation of mitigation measures. As shown in Columns 5 and 6, Project Impact Post Mitigation, therein, all cumulative project traffic is not expected to impact either local area streets or freeway systems within the region on either a project-specific or cumulative basis with the implementation of these mitigation measures. Therefore, no significant impacts are anticipated as a result of project implementation.

After the implementation of project-specific City Mitigation Measures for transportation and circulation listed in Table 4.13-9 (Revised) in the Final SEIR, no significant impacts would occur.

Topical Issue 21: Fire Prevention and Control

Comments have been raised that the proposed project could create a major fire that could spread into the adjacent community.

Response:

The project site where the proposed landfill footprint is planned is disturbed due to extensive landfilling operations that have taken place in one form or another for a period of nearly 40 years, and it would be adjacent to current County Landfill operations. However, much of the surrounding terrain is mountainous and in a natural state. The portion of the project site located within the City is designated as a Mountain Fire District. Areas adjacent to the site are covered with chaparral and coastal sage scrub that, in combination with high winds, have the potential to create an extreme fire hazard.

Brush fires have the potential to occur at or near the project site. Small onsite brush fires will be controlled by using landfill equipment such as tracked dozers, scrapers, and water trucks. In the event that a brush fire encroaches onto the project site, landfill operations would immediately cease until either the LAFD or Los Angeles County Fire Department (LACFD) is notified. However, tracked dozers could be mobilized immediately by landfill personnel to create firebreaks. All landfill personnel are trained to handle small fires and, if necessary, could provide assistance to fire personnel extinguishing small brush fires in and around the project site. The project proponent would provide heavy equipment to either the LAFD or LACFD to combat offsite brush fires near the project site. The threat of a fire igniting onsite and then spreading offsite would be considered rare because most areas around the landfill's footprint area would be graded and surficial vegetation removed, thereby eliminating combustible brush.

The primary fire concern at a landfill site is associated with a "hot load." A hot load is defined as a truck that brings ignited refuse to the landfill site. If a hot load is brought to the project site, landfill personnel will direct the load to an isolated area of the site where it would be properly extinguished with either tracked dozers, scrapers, or other fire-suppression measures, including water, dry chemical extinguishers, or smothering.

Another potential fire source is a subsurface refuse fire. This fire is triggered by the burial of a hot load igniting other refuse materials, the improper operation of the LFG collection system, or the inadvertent burial of chemical waste. Subsurface fires are dependent on waste composition, moisture content, available oxygen, ambient soil-air pressure, and the insulating characteristics of the surrounding fill-and-cover material. This type of fire is minimized by landfill design features, in-place control features used during the operation of the LFG collection and flaring system, and the proper application of cover material. The proposed design of the landfill and environmental control features will alleviate this hazard.

The potential for a subsurface fire ignited by a surface fire is also extremely remote because cover soils isolate surface fires, preventing them from igniting subsurface waste materials; the amount of waste materials above the surface is limited to the amount deposited on any given day; and landfill personnel can quickly extinguish surface fires with fire-suppression equipment. Open flames in a landfill as a result of a subsurface fire are highly unlikely. Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire or the venting of smoke or combustion of byproducts through the landfill cover material. Control of subsurface fires requires removing combustible material, eliminating the air supply, or cooling the fire zone below the ignition temperature. Because these fire control techniques are effective in extinguishing deep landfill fires, a long-term uncontrollable subsurface fire at the project site is considered very remote.

The inactive City Landfill, access road, and operational County Landfill serve as a partial firebreak from surrounding brush areas. Located near the western perimeter ridgeline of the site is a 100,000-gallon water tank that supplies water to the inactive City Landfill and provides necessary onsite fire flow capability. Existing water lines distribute water throughout the project site. In addition, within the County, another 265,000-gallon water tank and three fire hydrants are provided to meet fire flow demands for the County landfill.

A fire response plan has been prepared for all landfill personnel. This plan details procedures to follow in the event of a fire or explosion, designates an emergency coordinator, and establishes safe havens for employees. All landfill personnel are trained in where the nearest fire extinguishers are located, how to extinguish small fires, and who to contact in case of an emergency.

With the incorporation of City Mitigation Measures for fires identified in the Draft SEIR, Section 4.14.1, Fire Emergency Medical Services, pp. 4-398 through 4-400, no significant impacts would occur.

Topical Issue 22: Compatibility with Residential Uses

Comments have been raised regarding the proximity of the site to residential uses.

Response:

The project site is topographically isolated and lies within a portion of the Santa Susana Mountains. The ±100 acre open-space area located along the southern perimeter of the project site has undergone extensive revegetation and has been planted with over 11,000 trees. Many of these trees are native and are over 15 feet high. This open-space area is elevated several hundred feet higher (i.e., ranging in height from 1,425 to 1,975 feet above mean sea level [MSL]) than existing residential areas located to the south (i.e., approximately 1,300 to 1,400 feet above MSL).

Six trailers are located immediately east of the landfill entrance, across San Fernando Road. At final fill, the proposed landfill footprint would be located ±700 feet from these uses. Additionally, the proposed landfill footprint would be located ±1,700 feet from the closest residential house located on Timber Ridge Drive in Granada Hills. The existing perimeter ridgeline, open-space area, and portions of the existing inactive landfill form an effective transition between residential use and proposed landfill operations and activities. The proposed project would not affect privacy nor would it hinder the interaction or movement of people, goods, or information. The proposed project would be physically compatible and consistent with its surrounding environs, including existing residential land uses located near the project site.

The proposed City/County Landfill footprint's maximum vertical height at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL. The top deck area at this height would consist of approximately 34 acres within City jurisdiction. This top deck area would be contoured to blend into the surrounding natural terrain. At this elevation located near the City/County boundary, the proposed project would descend westerly (1,885 feet MSL) to encompass land within the County portion of Sunshine Canyon and connect vertically and horizontally with the approved County Landfill footprint. The proposed landfill footprint would also descend (to 1,800 feet) southerly to abut with the existing inactive landfill. Due to its physical location within the interior of Sunshine Canyon, the top deck of the landfill footprint will be effectively shielded from public views within Granada Hills. However, the following landfill locations would be visible: a comparatively small portion of the landfill footprint near the mouth of the canyon (1,350 feet MSL), along the northern perimeter ridgeline (1,825 feet MSL), and adjacent to the mountainous areas near O'Melveny Park (where trails exist) that are higher in elevation than the landfill (e.g., Mission Point [2,771 feet MSL]).

The perimeter ridgeline along the southern boundary of the project site (near the City/County boundary) rises to a maximum elevation of about 2,150 feet MSL. The existing southern fill limits of the inactive landfill (i.e., larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills.

Topical Issue 23: Immediate Combined City/County Landfill Operations Alternative

Comments have been raised regarding which of the alternatives considered in the Draft SEIR would be the environmentally superior alternative.

Response:

Under the Immediate Combined City/County Landfill Operations Alternative, project development would immediately result in landfilling operations being commenced within one landfill footprint located in Sunshine Canyon. In comparison with the proposed project, this alternative would have a similar landfill footprint configuration encompassing ±451 acres. Also, like the proposed project, this landfill footprint would connect with the operational ±215-acre County Landfill. Refer to Figure 5.6-1 for the conceptual base grading plan for this alternative.

This alternative would provide a net disposal capacity of 90 million tons, and unlike the proposed project, landfilling operations would occur immediately at one single working face during the first 18 to 24 months rather than at two separate working faces, and there would be a single, joint intake area with a single set of scales and supporting administrative facilities. Approximately 11,000 tpd of waste would be received at one landfill footprint. The site life would be approximately 26 years, assuming a constant intake rate of 11,000 tpd.^{18/}

Development sequencing for this alternative would result in three sequences similar to the proposed project as shown on Figure 2.5-5. Under this alternative, development of the landfill footprint would initiate in the City jurisdiction, abut and overlay portions of the inactive landfill (Sequence A), proceed in a northerly

^{18/} Based on 90,000,000 tons of disposal capacity ÷ 11,000 intake tonnage × ÷ 312 operating days = 26.22 years of anticipated site life.

direction across the City and County boundary, and connect to the operational County Landfill (Sequence B). Once interim fill elevations are reached, the landfill footprint would extend back into the City jurisdiction (Sequence C).

Similar to the proposed project, implementation of this alternative would require some form of arrangement agreement between the City and the County to authorize common power over the entire project site. This agreement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill. Therefore, existing permitting requirements and regulatory obligations in connection with that landfill would effectively be maintained and, if necessary, modified or amended to reflect the resulting provisions established under the subject agreement.

Under this alternative, less significant impacts would occur (for up to 2 years) because landfilling operations would be contained at a single working face area. In comparison to the proposed project, the following environmental impacts would be reduced:

- ▶ During the first 18 to 24 months, less daily fugitive dust emissions would be generated because landfilling operations would be contained at one working face area instead of two separate working faces. During high-wind episodes (i.e., Santa Ana wind conditions), landfilling operations would be performed at wind-protected areas of the site within either jurisdiction. Potential offsite fugitive dust emissions would be reduced due to the flexible location of landfilling operations.
- ▶ During the first 18 to 24 months, less daily fugitive dust and mobile emissions would be generated during landfilling operations because refuse disposal would be contained within one working face of the landfill rather than two separate areas.
- ▶ During the first 18 to 24 months, the landfilling operations would result in less significant risk-of-upset conditions from litter generation because landfilling would be confined to wind-protected areas of the project site during high wind conditions. Offsite windblown litter would be reduced due to the flexible location of the active working face area.
- ▶ During the first 18 to 24 months, the landfilling operations would result in less significant risk-of-upset conditions from litter generation because landfilling would be confined to wind-protected areas of the project site during high wind conditions. Offsite windblown litter would be reduced due to the flexible location of the active working face area.
- ▶ This alternative would provide easier access to City and County Fire Departments and other emergency personnel due to reduced onsite vehicle congestion as a result of confining landfilling operations to one working face. The use of a single working face area would result in the need for less water consumption for dust control purposes.

Development of this alternative would reduce the long-term capital outlay necessary for infrastructure improvements because in-place infrastructure would be used immediately. By reducing the long-term capital costs for the project, the project proponent would be able to provide cost-effective tipping fees for the City, County, and private haulers at a centrally located, high-volume landfill facility.

In comparison with the proposed project, this alternative would meet all development and solid waste objectives. Implementation of this alternative would facilitate the waste planning efforts of the City and County necessary to meet their short-, mid-, and long-term planning needs.

The Immediate Combined City/County Landfill Operations Alternative would have less significant impacts than the proposed project for the first 18 to 24 months. Specifically, this alternative would result in less significant impacts on air quality (e.g., dust emissions), create less potential risk-of-upset conditions (windblown litter and worker safety associated with onsite vehicle routing), improve public services response (fire and emergency service access), and generate less potential demand for onsite water consumption.

Implementation of this alternative would not result in any area-wide or regional impacts that would be greater than the proposed project. Overall, this alternative would be considered environmentally superior to the proposed City/County Landfill Project because environmental impacts would be less for up to a 2-year period.

Topical Issue 24: Request for General Plan Amendment/Zone Change

Questions have been raised regarding the project proponent's request for a General Plan Amendment/Zone Change for the proposed project.

Response:

Prior to the filing of project applications on the proposed City/County Landfill, the project proponent was informed by the City Zoning Administrator that, for the landfill being proposed, the consideration of a GPA/ZC for the entire ±494 acre project site within City jurisdiction would be preferable to the variance process that had entitled the prior operational City Landfill (1966 through 1991). The City did not propose the zone change; it simply determined that such an entitlement process would be superior to the previous zone variance. Additionally, prior to the filing of the current application, in December 1990, John J. Parker, Associate Zoning Administrator, stated the following:

“In the opinion of the Administrator, no future entitlements with respect to Sunshine Canyon Landfill should be considered under a zone variance process. The findings for a zone variance do not speak to the merits of the project, but more directly to hardships, special circumstances and property rights, which are arguably not the most appropriate findings for this type of case.”

Mr. Parker went on to say that a change of both the zone and General Plan designation on the property to a (Q) M3 Zone and a Heavy Industry use designation would be a more appropriate discretionary entitlement.

The change of land use designation to “Heavy Industrial” and the rezoning of the property to M3 would allow for the proposed landfill project, but conditions of the General Plan Amendment and “Q” conditions (qualified classification) attached to the rezoning would limit the uses on the project site to either those existing uses or those related to the proposed landfilling activities. The “Q” qualified classification may be designated by the City so that the project site would not be utilized for all the uses ordinarily permitted within the M3 zone classification and/or that the development of the site would conform to certain specified standards, if such limitations are deemed necessary, to secure an appropriate development consistent with the objectives of the General Plan and ensure compatibility with surrounding property. (Refer to the Los

Angeles Municipal Code, §12.32 J.) Limiting "Q" conditions could be imposed at the time of General Plan Amendment/zone change approval which could prohibit non-landfill-related, industrial uses and activities on the property, including the M3 zone uses specifically mentioned during the public hearing on October 29, 1998, such as manufacturing plants that produce chemicals, acetylene, gas, chlorine gas, disinfectants, pesticides, paint, plastics, petroleum products and glass; and industrial uses such as bronze casting, automotive dismantling, canneries, foundries, grain fermenting, and lumber yards. When the landfill stops accepting waste, State regulations will limit the uses that will be permitted. However, beneficial landfill uses which utilize byproducts from the natural decomposition of waste in the landfill would not and should not be prohibited. Such beneficial uses could include the productive use of landfill gas as fuel or the conversion of such gas into energy. Currently, such gas is flared at the County Landfill.

Both state^{19/} and federal^{20/} regulations require the owner or operator of a landfill to maintain and monitor the landfill for a minimum period of 30 years after the completion of landfill closure. A Closure Plan must be approved in addition to a Post-closure Maintenance Plan. Under these plans, a landfill must be closely monitored during this period to ensure that leachate, gas, dust, drainage and erosion controls are sufficiently maintained and that other performance standards incorporated into landfill design are being met to satisfy public health and safety requirements. An emergency response plan and site security measures are required, and any post-closure land use or construction must be approved by various State and local regulatory agencies. These maintenance and monitoring activities during the closure and post-closure periods are industrial in nature, with associated legal requirements and liability, rendering most non-industrial uses of the landfill property infeasible during the closure and post-closure periods and justifying an industrial designation and corresponding zone throughout the entire closure/post-closure process.

Facilities (i.e., portable trailers) currently located on County land within Sunshine Canyon would be relocated and related site improvements would result in the following construction in the City (with approximate floor area of each structure): caretaker unit (1,400 sq. ft.); administration building (4,000 sq. ft.); maintenance building (1,700 sq. ft.); scale house (800 sq. ft.); leachate treatment plant (5,000 sq. ft.); environmental learning center (1,440 sq. ft.); and employee lunch room and locker facilities (1,800 sq. ft.). Related parking areas would also be developed. Figure 2.4-5 in the Draft SEIR indicates the proposed locations of these facilities. The public dropoff and the buyback area for recycling center are no longer proposed. The nursery shown on Figure 2.4-5 is currently proposed to be located in the northerly area of the City portion of the site. The existing access road in the City will be relocated as landfilling progresses within Sunshine Canyon, and it is depicted in Figure 2.5-2 of the Draft SEIR on an area of approximately 3.3 acres.

Additionally, the development, operation, maintenance, and monitoring of a Class III landfill would not permit the disposal of hazardous waste. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility. In this regard, a comprehensive hazardous load checking program would be implemented, which would include employees visually inspecting incoming loads at the scale house area, using television monitors and radiation detectors at the landfill entrance, performing random load checks of vehicles, and providing spotters at the active working face of the landfill.

^{19/} Regulations of the California Integrated Waste Management Board ("CIWMB") set forth in California Code of Regulations ("CCR") Title 27, Division 2, Chapter 3, Subchapter 5, §§ 20950 et seq., § 21180

^{20/} 40 Code of Federal Regulations ("CFR"), Part 258, Subtitle D; Subpart F, § 258.61

An adjoining approximately 5-acre remnant portion of Tract 9673, located northeast of the proposed landfill, is zoned A1-1 and is not owned by the Applicant. The tract map for Tract 9673 was recorded in 1927. According to title research, all of the lots in the tract were acquired by the State of California (by deeds and/or final orders of condemnation) some time in the 1960s for construction of the Golden State Freeway. The latest AP map available (AP Book 2601, page 4) shows that the Golden State I-5 Freeway completely enveloped the tract with all parcels tied together. In 1983, a Director's Deed from Caltrans was recorded indicating that the property was excess land and landlocked. This Deed recites the following on page 3:

There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway. The above-described real property is landlocked and without any direct access to the freeway or to any public or private road. The State of California is without obligation or liability to provide access to the said real property.

According to Chicago Title, the property appears never to have been insured by a title company. Based on the amount of documentary transfer tax paid in 1983 (i.e., \$12.10), the consideration paid for this parcel is estimated at approximately \$11,000.

Given the landlocked nature of this remnant parcel, it no longer meets the definition of a lot under the Los Angeles Municipal Code. This property has remained vacant and unused since 1927 and cannot be developed. It was purchased with full knowledge of its lack of access. To avoid creating a spot zone of a small island of A1-zoned property, one of the most restrictive zones, surrounded by industrial uses and M3 and PF zoned property, the least restrictive zones, the property should be re-zoned to [Q]M3, as an "added area," in the pending zone change proceedings, with uses restricted to those permitted in adjoining property and with all other uses subject to review and approval by a Zoning Administrator.

Additional information regarding the proposed City/County Landfill's consistency with the Granada Hills-Knollwood Community Plan can be found in Topical Issue 15.

Topical Issue 25: Performance of a Health Risk Assessment

Comments have been made regarding the need to prepare a health study vs. a health risk assessment for the proposed project.

Response:

No new information has been presented that would warrant an additional health study. Prior to preparation of the Draft SEIR, comments were received from individuals during the NOP process that pertained to potential human health impacts (e.g., incidence of cancer, respiratory ailments and diseases, allergies, skin disorders, and airborne toxins). Most of the concerns were raised by individuals who resided in the Granada Hills area. In response to these concerns, City Planning staff initiated investigations and had several meetings with leading medical authorities, such as Paul J. Papanek, M.D., M.P.H. (Chief, Toxics Epidemiology Program, Disease Control Programs of the County of Los Angeles, Department of Health Services) and Thomas M. Mack, M.D., M.P.H. (Professor of Preventive Medicine, University of Southern California, School of Medicine). Based on the review of existing information and the advice of these experts, City Planning staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.

It should be noted that Dr. Papanek indicated the potential for significant human health risk impacts to be statistically attributable to a Class III landfill is generally low. His comments were based on his extensive review of published scientific studies of landfill sites located throughout California. Dr. Mack, who has designed, researched, and prepared a number of epidemiological studies for hazardous Class I waste landfills, indicated it would be unlikely that an epidemiological study for the proposed project would produce a definitive finding linking health problems of area residents to the landfill site. In summary, based on the results of this information and analysis, the proposed project will not have a significant effect on human health in the area of the project.

In addition, and as discussed in the Draft SEIR, Section 4.2.9, Health Risk Analysis, p. 4-76, the use of SCREEN2 as a screening level assessment for CEQA purposes was established in a modeling protocol received and reviewed by SCAQMD staff. The protocol specified use of SCREEN2 for the initial assessment. If the results did not establish a less than significant impact with an adequate margin of safety, then BEEST-X, a hybrid combination of ISCST2 and COMPLEX 1, was to be used. This protocol was followed in the Draft SEIR. SCREEN2 model input/output assumptions and derivations were presented in detail in the Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, and include the computer output sheets with all specified input parameters. The SCREEN2 analysis shows that toxic emissions are below the SCAQMD significance threshold of one in 1,000,000 for cumulative maximum individual cancer risk.

The City's Zoning Administrator originally determined in September 1988 that a health study was desirable because information in the record pertaining to this issue was not adequate to prove adverse health affects. Specifically, the Zoning Administrator stated:

Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contained no scientific or expert documentation relating to this.

With respect to the "informal health survey" sent by landfill opponents to area residents in 1988, the Zoning Administrator stated in his findings (September 1988) regarding Case No. ZA 17804 (RV):

Health Impacts - This major allegation remains unproven. The health survey mailed to 5,000 residents was not scientific in its consideration. It would have been virtually impossible to answer it, absent perfect health, without appearing to indict the landfill for problems of allergies, respiratory ailments, skin diseases, etc. The questions and answers are not statistically valid, due to their construction. It would also have been helpful to have had expert (medical) input. A major question which the Administrator has is: Are the rates of allergy, respiratory illness, etc., abnormal for this area, in consideration of the frequently high winds blowing from the north and the proximity of a northerly hinterland with substantial natural vegetation? Under those conditions, a prevalence of allergies (particularly in the Spring) would not be surprising.

It should also be noted that in response to his request, the project proponent submitted a proposal to the City Zoning Administrator for the purpose of conducting a health study. Lengthy discussions with the City ensued regarding revisions to the proposal, and modifications to the proposal were submitted. However, the City Zoning Administrator, possibly because of later statements by qualified epidemiologists regarding the absence of a significant health risk and the problematic nature of any "health study" in the subject neighborhood, did not act on that proposal.

Additional information regarding the revisions in the Final SEIR with respect to air quality data can be found in Topical Issue 27.

Topical Issue 26: Alleged Zoning Violations and Related Variance Revocation Proceedings

Comments have been made regarding the alleged zoning violations and the variance revocation proceedings when the City Landfill was in operation.

Response:

The history of BFI's alleged zoning violations and the related variance revocation proceedings was fully described in the *Additional CEQA Document* (April 1993), Section 2.4.2, City of Los Angeles Proceedings, pp. 2-6 and 2-7. The zoning proceedings were referenced within Appendix C of the same document. In summary, in 1988, the City Zoning Administrator found that some conditions of the City Landfill zoning variance had been violated, while also finding that allegations regarding other asserted violations were unfounded. The North Valley Coalition of Concerned Citizens (NVC) and BFI both filed appeals regarding the Zoning Administrator's decision.

When the City Landfill ceased operation in September 1991, the Zoning Administrator found that certain variance conditions were still enforceable, even though the landfill was inactive. BFI contested that decision and appealed that decision to the Board of Zoning Appeals (BZA). This appeal was heard by the BZA in November 1991. In its determination in December 1991, the BZA upheld the Zoning Administrator's decision to impose and enforce some of the conditions of the zoning variance.

BFI has never been found by the City to be in violation of the following zoning variance conditions that were placed on the City Landfill. In addition, the City never gave notice to BFI that any of these conditions were violated:

- Condition No. 2 (Condition of premises and parks and recreation) - Once the Closure and Post-closure period (at least 30 years) has expired, a letter will be sent to the City Parks and Recreation Department notifying them that the property would be available. In the meantime, since the landfill ceased operation, the premises have been left in a neat and orderly manner.
- Condition No. 4 (Final contour plans) - Proposed final contour plans were submitted to the Zoning Administrator and as part of the Closure and Postclosure Maintenance Plan.
- Condition No. 5 (Water tanks and litter fence) - No onsite improvements are visible to the surrounding properties in the immediate vicinity. The request for approval to perform stream enhancement work was initiated by BFI and approved by the Zoning Administrator. This work was not a condition of the zoning variance under which the City Landfill operated. No work has been performed on this matter.
- Condition No. 6 (Possible relocation of entrance roadway) - The relocation of the entrance roadway into the landfill facility was not a condition of the zoning variance under which the City Landfill operated (when it was operational). The condition stated that certain specifications will apply if the entrance and entrance roadway are relocated as a result of building the sedimentation basin.

- Condition No. 7 (City Oak Tree Ordinance) - BFI was never found by the Zoning Administrator to be in violation of any of the regulations of the Oak Tree Ordinance, and the City never gave BFI notice or indication that this condition was violated.
- Condition No. 8 (Survey) - The variance boundary survey will be accomplished during the closure approval process after additional survey monument requirements are identified by appropriate regulatory agencies.
- Condition No. 9 (Boundaries) - There have been no violations of this condition since its imposition in 1989. The City never gave BFI notice or indication that this condition was violated.
- Condition No. 11 (Proposed sedimentation basin) - BFI had not violated this condition, since the building of the sedimentation basin is not a condition of the zoning variance. This condition states that "should the applicant proceed with construction of the sedimentation basin" certain specifications and regulations must be met. BFI has been working with the City to coordinate the installation of the sedimentation basin required for closure.
- Condition No. 12 (Removal of structures) - Facilities necessary for closure and post-closure purposes will remain onsite. BFI has sent a map depicting these facilities to the City Zoning Administrator. Those onsite facilities, which are deemed unnecessary by the City LEA, will be removed when the Closure and Post-closure Maintenance Plan is approved by the City and CIWMB. Approval of this plan has been delayed for a number of reasons, primarily the lengthy litigation brought by the City against the County and BFI relative to the County Landfill.
- Condition No. 13 (Aerial photograph) - This condition was not found by the Zoning Administrator to have been violated. This condition was imposed in 1991. An aerial photograph was ordered by BFI and was delivered to the City Zoning Administrator.
- Condition No. 14 (Operator inability to comply) - BFI is complying with this condition, and has been coordinating its compliance within its Closure and Postclosure Maintenance Plan, which is currently being processed by the City.

Three conditions were found (in 1988) by the City to be violated during the zone revocation proceedings. These conditions included:

- Condition No. 1 (Vertical height of landfill operations)
- Condition No. 3 (Setback requirements) - The Bureau of Sanitation issued a violation (in 1990) for landfilling operations within the 600-foot setback area. However, the Zoning Administrator concluded that the violation was isolated "considering the landfill operator's overall compliance with conditions and regulations since July, 1989," and that it "was inadvertent and minor, inasmuch as no actual detriment occurred to surrounding properties." No further violation of this condition occurred, and the City never gave BFI notice or indication that this condition was violated.
- Condition No. 10 (Elevations) - In 1991, the Zoning Administrator found that BFI had failed to expressly seek approval to operate within less than 50 vertical feet of an existing ridge for this use.

BFI believed that prior approval had been granted as part of a previous action, and the BZA found that there was no intention on the part of BFI to violate this condition.

BFI engaged with the City to comply with the following condition:

- Condition No. 15 (City inspections) - BFI has paid fees to the City LEA to satisfy this condition.

It should also be noted that the Zoning Administrator determined in September 1991 that certain conditions of ZA-17804(ZV) and ZA-89-1129(ZV) would remain in effect after September 21, 1991, which was the expiration date for the Sunshine Canyon Landfill to cease its landfilling operations. As noted by the Zoning Administrator, six conditions remained in effect and must be complied with by the project proponent. These six conditions included the following:

1. ZA-17804 - Condition No. 14:

That at the expiration of this grant or the completion of the land reclamation operations, the premises shall be left in a neat and orderly manner with no uncovered material, debris or waste products left on the premises. Further, upon the completion of the project, the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes.

While laws subsequent to 1966 may affect the use of the site for recreational purposes, the condition can be fulfilled by the action required.

Note: The project proponent submitted correspondence to both City and County recreation departments informing them that this condition would be complied with once closure and post-closure maintenance activities on the inactive City Landfill cease (a minimum 30-year period).

2. ZA-89-1129 - Condition No. 1:

- a. The applicant shall prepare a survey of the boundaries and elevations of the approved variance, in conformity with Conditions No. 2 and 3 herein. Said survey shall be conducted by an independent surveyor mutually acceptable to the applicant and the Office of Zoning Administration, which latter shall act on consultation with the Office of Council District 12, the Bureau of Sanitation and the Bureau of Engineering. Until such survey is completed and certified to the satisfaction of the aforementioned parties, the Bureau of Sanitation shall continue to enforce the boundaries and elevations which have been so utilized since the City Council action of July, 1989.
- b. Said independent surveyor shall be selected by the applicant within two weeks of the effective date of the subject variance action.
- c. Said survey shall be provided to the aforementioned City parties for review within ten weeks following the effective date of the subject variance action.

This condition became effective on August 31, 1991. The ten-week deadline for providing the survey (paragraph C) will obviously expire after September 21, 1991. The survey was needed to resolve the longstanding disputes over the proper location of the variance boundaries, and to clarify boundaries for any future entitlements sought within the Sunshine Canyon property.

Note: This condition was satisfied by the Applicant with the submittal of closure and post-closure maintenance plans to the City LEA, CIWMB, and LARWQCB. Included within those plans is the engineered survey of the existing inactive landfill, its exact landfill footprint boundary and ancillary facilities.

3. ZA-89-1129 - Condition No. 7:

Should the applicant proceed with construction of the sedimentation basin, said basin shall be constructed at a size which is adequate to the needs of the existing site, but which is not larger than necessary for the purpose of closure of the existing landfill. The construction shall be designed to meet minimum regulations and the determination of the final need and size shall be made by the Zoning Administrator in consultation with the appropriate regulatory agencies.

This condition will apply should the Bureau of Sanitation require the construction of a sedimentation basin within the variance area as a condition of closure.

Note: This condition will be satisfied once the development of the sedimentation basin (for closure purposes) commences. Plans and specifications for this basin were submitted as part of the closure and postclosure maintenance plans to the City, CIWMB, and LARWQCB.

4. ZA-89-1129 - Condition No. 8:

- a. Within six months after the landfill is full or after September 21, 1991, whichever occurs first, all landfill buildings, scales, checking stations, recycling center and facilities to accept trash shall be dismantled and removed from the site, except for offices and facilities necessary to monitor the closure plans.
- b. Prior to establishment or continuance of said facilities after September 21, 1991, a plan(s) shall be submitted to the Zoning Administrator along with evidence that said facilities are strictly for the purpose of monitoring the closure plans for the City landfill portion of the site. The Zoning Administrator shall consult with the various regulatory agencies to verify that the facilities are for said purpose before authorizing the continuance or establishment of said facilities. Further, the Zoning Administrator may condition the authorization of said facilities.

It is noted that, during the life of ZA-17804, the variance area was not subject to the Oak Tree Ordinance (Ordinance No. 153,748) due to the express exemption under LAMC 46.02(a)2. However, after the expiration of the variance on September 21, 1991, future activities within the same area will be subject to the ordinance.

Note: Closure and post-closure maintenance plans confirmed which facilities would remain onsite. Any existing facilities remaining onsite were authorized by the City.

5. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 1:

If the applicant cannot comply with the provisions of a condition of the variances due to a determination, requirement, etc. of a governmental agency, the applicant shall secure a written statement from the head of said agency explaining why the condition or provisions of the condition cannot be met and whether there is an alternative for meeting the condition or how the condition could be modified to enable the compliance intended.

Note: The project proponent has not had to obtain such a statement.

6. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 2:

The applicant shall pay for an inspector to be assigned by the City to monitor compliance with all the conditions of the variances which were not complied with prior to the expiration of the subject variance for the filling phase of the landfill project.

Note: The project proponent continues to pay a yearly fees to the City LEA to monitor the inactive landfill, even though this facility has ceased accepting waste. The City LEA agreed that as a result of the fees being paid, and the ability to monitor compliance at this facility, the project proponent has satisfy this condition.

Topical Issue 27: Revised Air Quality Data

Comments have been made regarding the revisions in the Final SEIR with respect to air quality data.

Response:

Several components of the air quality analyses presented in Section 4.2, Air Quality of the Draft SEIR were revised to incorporate comments received by the SCAQMD, County LEA, and LAUSD. Many of the comments resulted in more refined emissions estimates and modeled impacts than shown in the Draft SEIR. Section 4.2, Air Quality, of the Draft SEIR was revised to incorporate these changes in one location, rather than simply reporting the revised estimates in the responses to comments. This information is incorporated into this Final SEIR as Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality.

Since the Draft SEIR was prepared, certain reference documents and analytical tools relied upon to conduct the air quality analyses have been updated. Specifically, the Draft SEIR circulated for public comment in July 1997 used a standard reference document (AP-42) to calculate emissions from certain operational and construction activities and to quantify the effectiveness of some mitigation measures. The 1985 version of AP-42 was used to calculate exhaust and fugitive dust emissions. However, AP-42 was updated in 1995. This version reflects more refined emission factors for fugitive dust emissions. (The exhaust emission factors in AP-42 have not yet been updated.) In the revised air quality analyses, the construction and operational emissions have been updated to reflect the new emission factors in the 1995 version of AP-42. This has resulted in an increase in emissions from some sources and in other cases estimates were reduced. For

example, the emission factor for dust from vehicles driving over paved roads was reduced, and as a result, the estimate of PM₁₀ emissions dropped substantially.

In addition, the Draft SEIR used the SCREEN 2 model to perform the Health Risk Analysis for the flares and EMFAC7ED to model vehicle emissions. The SCAQMD in its comments recommended the use of the ISCST3 model and the 1998 version of EMFAC7G. Additional modeling studies were run using the suggested models and the results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality; and Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment in this document.

Landfill gas generation and gas composition rates have been revised to reflect current conditions at the project site. In regard to gas generation rates, the County FEIR used projections based on eight flares and gas composition characteristics typical of landfills in general. Based on experience gained from the gas collection system at the existing inactive City Landfill and the County Landfill, gas generation from the proposed project is now expected to be substantially lower than originally projected. Accordingly, the project proponent anticipates only five flares will be required to flare gas generated for the entire City/County Landfill. (These will include the existing flare at the existing inactive City Landfill, two flares at the County Landfill [one now in operation and one permitted but not constructed] and two new flares associated with the proposed project.) The information on gas composition was also updated to reflect onsite data from the gas flared by the two flares already in operation. The revised modeling study now uses the maximum permitted capacity of five flares for the worst-case analysis and onsite gas composition data. As a result, emissions estimates from the flares have increased and SO_x emissions now exceed the SCAQMD's CEQA significance threshold. These results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality; and Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment of this document.

The revisions to Section 4.2, Air Quality, of the Draft SEIR do not identify any new emission sources or contaminants. These revisions provide a more accurate estimate of emissions from landfill construction and operation, and impact on air quality relating to the comments made by the SCAQMD, County LEA, and the LAUSD.

Refer to Responses 63 and 70 (Letter 3.4-4, SCAQMD), 97 (Letter 3.5.1, Department of Health Services County of Los Angeles), and 252 and 257 (Letter 3.8-1, Los Angeles Unified School District) in Section 3.0, Response to Comments. Additional information regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills can be found in Topical Issue 3.

Topical Issue 28: Working Arrangement Between the City and County

Comments have been made regarding the working arrangement that would be necessary between the City and County.

Response:

The concept of "joint operation" refers to the proposed working arrangement between the City and County that would recognize and maintain discretionary approvals, permitting requirements, regulatory obligations, contractual agreements, and other arrangements needed for the joint development, construction, operation

and maintenance of a landfill working face area within either jurisdiction of Sunshine Canyon, including the division of Local Enforcement Agency (LEA) responsibility and a percentage of proceeds from the disposal of waste. The potential form of agreement between the City and County has been discussed with City Planning staff, the Program Manager of the Environmental Affairs Department, the County Department of Public Works (DPW), and the County Department of Health Services (DHS). As stated, in pertinent part, in the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38:

It is anticipated that . . . both jurisdictions will execute a working arrangement, regarding the joint operation of the City/County Landfill. This arrangement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill.

That agreement would state the purposes and powers to be exercised by both jurisdictions, including, but not limited to, the following:

- ▶ combine City/County LEA monitoring and enforcement activities at the proposed City/County Landfill into a single authority, with one jurisdiction taking the lead in overseeing operational activities at the landfill, in order to avoid duplication of work and effort and ensure efficient administration, but the selection of the lead jurisdiction has not yet occurred;
- ▶ allow the mutual use of the access road, ancillary facilities and areas, and environmental protection and control systems;
- ▶ set reimbursement obligations;
- ▶ establish tipping fee structures; and
- ▶ establish revenue sharing by the City and County.

The working agreement could take the form of a standard State-authorized development agreement that the applicant would enter into with both the City and the County. Issues to be covered in such an agreement would include, in addition to the vesting of each jurisdiction's approved entitlements for the landfill, the imposition of tipping fees, means of dividing the tipping fee revenue between the jurisdictions and the various operational responsibilities detailed above. With respect to the revenue to be received by the respective jurisdictions, currently, condition 14 of the County Landfill CUP provides for the permittee to pay to the County a fee equal to ten percent of the sum of the following:

- The net tipping fees collected at the landfill, (including any fees received as a part of a materials recovery program), the net tipping fee being the total collected less any other fees or taxes imposed by any federal, state or local agency and included in the fee charged at the landfill entrance;
- Gas-to-energy or direct gas sale revenues, less any federal, state, or local fees or taxes included in such revenues.

This condition provides a credit mechanism if the County imposes a business tax on landfill revenues, and specifies that if at any time during the life of the CUP the permittee is operating the landfill within both unincorporated and City territory, then the required fee would be reduced in proportion to the relative

amounts of waste placed or processed and the gas produced and used or sold in the two jurisdictions. In the case of the proposed City/County Landfill, assuming the City were to impose a similar 10% tipping fee, an allocation of the 10% tipping fee could be made based on the percentage of remaining capacity within the City and County portions of the landfill footprint area, and the fee could be collected and divided between the City and County pursuant to such allocation. The division of the fee revenue would be made regardless of where the waste is actually disposed of within the landfill footprint. The agreement could also provide for an audit every year.

Topical Issue 29: Liner System and its Ability to Withstand Earthquakes

Concerns have been raised regarding the proposed liner system and its ability to withstand significant earthquakes.

Response:

The landfill has been designed to withstand a peak ground acceleration of greater than 1.0 g, as discussed on page 15 of Appendix C15 of the draft SEIR. For the Sunshine Canyon County Extension Landfill, the calculated permanent movement of the waste mass relative to the liner system in this 1.0+g earthquake is 5.3 inches (Table 5-5, referenced on page 39 of Appendix C15). This relative movement is a result of the earthquake ground vibrations (strong shaking) and is different from the tectonic movement of the ground beneath the landfill in the earthquake. This calculated relative movement of 5.3 inches is less than the maximum value considered acceptable by the Regional Water Quality Control Board (RWQCB), the Department of Water Resources, and the landfill engineering community.

Testimony at the public hearing confused this relative displacement between the waste mass and liner system with the tectonic displacement experienced by the ground in an earthquake. The earthquake displacements that occurred in the region following the San Fernando and Northridge Earthquakes were regional tectonic displacements. The landfill can withstand regional tectonic displacements in excess of ten feet, as regional tectonic displacements do not put any stress on the liner system.

The design ground motions were developed based upon the most recent information on regional seismicity from the USC Earthquake Center (SCEC). It is the responsibility of RWQCB, as lead agency for the liner design, to review and approve the design. The ground motions were subject to intense scrutiny in the RWQCB hearings for the County Landfill. At those hearings, Dr. Norman Abramson, an SCEC principal investigator hired by the North Valley Coalition, testified that he had reviewed the design ground motions for the landfill and had found them to be appropriate. The RWQCB uses the State Department of Water Resources as an expert for earthquake design. The design ground motions were also reviewed and approved by earthquake experts from the California Department of Water Resources, Division of Dams and Embankments. Additional information regarding the design of the proposed landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems can be found in Topical Issue 1. Additional information regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake and the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake can be found in Topical Issue 2.

Topical Issue 30: Request for Additional Open Space Dedication

Concerns were raised in written comments from the public hearing regarding the inadequacy of open space surrounding the site. The following potential mitigation measures were suggested:

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at the northern end of the Weldon Canyon Motorway at its junction with Coltrane Street. (This would provide access to the Weldon Canyon Motorway by way of trail to connect with other access routes provided through the County conditional use grant).

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at Mission Point that includes the peak west of and 1/3 of a mile from O'Melveny Park. (This would provide public access to an area that has been very popular for decades with hikers, bicyclists, equestrians, and nature lovers.)

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at the headwater area of Rice Canyon Creek. (This is to further the development of Santa Clarita Woodlands Park as part of a similar effort in the County conditional use grant.)

Response:

Recognizing the need to preserve the character of the surrounding area, as well as the deficiency of park lands, Sunshine Canyon Landfill will maintain the existing open space area situated south of the City Landfill, which separates Sunshine Canyon Landfill from the nearest residential units in Granada Hills and consists of approximately 100 acres, as open space under the proposed project. In this regard, the project proponent has decided to eliminate this 100-acre area from its request for a general plan amendment and zone change, which would mean the continuation of the existing "Open Space" designation and A1 zoning for this property. The existing uses in this open space area include a caretaker house, a cellular telephone tower and equipment shed, surface and subsurface pipelines, active and inactive oil wells, above-ground oil storage tanks, and a landfill liquid separator and sewer connection. The only regular physical activity in the area is infrequent maintenance of the cellular telephone tower and daily removal of oil from production storage tanks by an oil tanker truck. The project proponent expects no change of this activity in the future.

As for other properties owned by the Applicant in the vicinity of the project, their status is as follows:

- Approximately 426 acres of East Canyon, which is situated immediately west of Sunshine Canyon, are being dedicated to the Santa Monica Mountains Conservancy.
- The Applicant is also conveying to the Conservancy easements for open space and recreational purposes over approximately 81 acres of the perimeter area between East Canyon and Sunshine Canyon and along the northeast perimeter of Sunshine Canyon. This acreage is a part of the Santa Clarita Woodlands Park. This open space dedication fills a need in the area for a regional park in the Northwest Valley, and is consistent with needs expressed in the Los Angeles Citywide General Plan Framework DEIR, as well as the County of Los Angeles General Plan, Conservation, Open Space, and Recreational Element.
- Moreover, the Applicant is currently working to acquire approximately 490 acres of Bee Canyon, situated west/southwest of the proposed City/County Landfill, for preservation

as open space. This area will provide the connection between O'Melveny Park and East Canyon.

Accordingly, in total, nearly 1,100 acres in the immediate vicinity of the proposed City/County Landfill will be preserved as permanent open space through the efforts of the Applicant, while the footprint of the proposed Sunshine Canyon Landfill extension would occupy a combined (City/County) total of only ±450 acres. Since dedication of open space to working space is at a ratio of more than 2:1 (open space: working space) there is not a demonstrated need for additional transfer of ownership to a conservancy or other agency beyond the open space areas which have already been provided for.

DECEMBER 1998 - RESPONSES
- Exhibit No. E-16

**RESPONSES TO COMMENTS
PUBLIC HEARING
ON THE GENERAL PLAN AMENDMENT/ZONE CHANGE
(October 29, 1998)
FOR THE
PROPOSED SUNSHINE CANYON LANDFILL
CITY OF LOS ANGELES**

City Plan Case No. 98-0184 MPR/ZC/GPA
Nicolas Brown, Hearing Examiner
CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
221 S. Figueroa Street, Suite 310
Los Angeles, CA 90012

December 1998

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PUBLIC HEARING REFERENCE MATERIALS (Bound and Submitted Separately)

Attachments

- A. NOTICE OF PUBLIC HEARING**
- B. MAILING LIST FOR PROPERTY OWNERS/OCCUPANTS WITHIN A 2-MILE RADIUS AND STATEMENT OF MAILING**
- C. NEWSPAPER NOTICES AND PROOFS OF PUBLICATION**
- D. PUBLIC HEARING CONTACT DATABASE**
- E. TRANSCRIPT OF PROCEEDINGS OF THE HEARING EXAMINER PUBLIC HEARING (October 29, 1998) AND LIST OF COMMENTERS WHO TESTIFIED AT THE HEARING**
- F. WRITTEN CORRESPONDENCE AND INFORMATION RECEIVED DURING THE HEARING (October 29, 1998) AND LIST OF COMMENTERS**

PUBLIC HEARING REFERENCE MATERIALS (Cont.)

Attachments

- G. WRITTEN CORRESPONDENCE AND INFORMATION SUBMITTED AFTER THE
CLOSE OF THE PUBLIC HEARING (October 30 through December 3, 1998) AND LIST
OF COMMENTERS
- H. RESPONSE TO LOS ANGELES UNIFIED SCHOOL DISTRICT LETTER

1.0 INTRODUCTION

This document has been prepared at the request of the City of Los Angeles (City) as the Lead Agency for the proposed Sunshine Canyon Landfill Project located in the City. This document addresses both verbal and written comments received during the public hearing held on Thursday, October 29, 1998, for the requested General Plan Amendment/Zone Change (GPA/ZC) for the proposed project, in addition to written comments received by the City after the close of the public hearing, from October 30 through December 3, 1998. A compilation of public notice materials, the public hearing transcript, and the written comments submitted to the City (e.g. Public Hearing Reference Materials) have been compiled as a separately bound document which accompanies this report.

1.1 Description of the Proposed Sunshine Canyon Landfill Project

The proposed project consists of the development, operation, maintenance, and monitoring of a Class III, nonhazardous solid waste landfill (herein, City/County Landfill or proposed project). A portion of the proposed City/County Landfill footprint is located on ± 194 acres within the City jurisdiction of Sunshine Canyon and provides an estimated net airspace disposal capacity of 55 million tons. In order to facilitate the design of the City/County Landfill, an additional area of approximately 42 acres within the County of Los Angeles jurisdiction of Sunshine Canyon would be developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the proposed landfill in the City and the operational County Landfill (landfill footprint of ± 215 acres).

The combined development of land within both jurisdictions would result in one landfill footprint being constructed in Sunshine Canyon. The landfill footprint configuration would ultimately encompass ± 451 acres. Ultimate City/County Landfill development within Sunshine Canyon would result in a net waste disposal capacity of 90 million tons (i.e., 55 million tons for the proposed landfill within the City, 18 million tons for the ± 42 acres of new landfill development within the County, and 17 million tons in connection with the already permitted, operational County landfill). This would provide for approximately 26 years of disposal capacity, assuming an average daily tonnage of 11,000 tpd. The maximum net tonnage that can be deposited per operating day is 12,000 tons (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the county). This proposed landfill footprint will abut and encompass ± 80 acres of the existing inactive landfill located in the City, which is in the closure process. Closure of the existing inactive City landfill is separate from this project and will proceed whether or not the proposed project is approved.

The proposed project requires separate entitlements from the City and County. These jurisdictions will enter into some form of working arrangement to exercise common power over the entire project site.

The proposed project includes development and operation of numerous ancillary areas and facilities to support landfilling operations at the City/County Landfill, including an onsite green waste/wood waste recycling area and an environmental learning center. All of these proposed uses would be located within the City portion of Sunshine Canyon and would support the City/County Landfill.

The proposed City/County Landfill would also use ancillary facilities that currently support the existing County Landfill. These facilities include the scale house, scales, administrative offices, caretaker facility, lunchroom/locker storage, maintenance and control buildings, and certain environmental protection and control systems (i.e., leachate treatment plant and storage tanks, surface drainage systems, and water storage tank). The use of these facilities and control systems for landfilling operations would continue until their

use is precluded by development on or near the ±42 acres within the County. Development in this area would necessitate the removal and relocation of many of these facilities onto the City portion of the landfill.

1.2 Regional Location/Project Setting/Access

The project site is located within the northwest Los Angeles region and within the corporate jurisdiction of the City and County of Los Angeles. The project site is further defined within the Northwest Valley Subregional planning area of the City. The project site is included within the City's Granada Hills-Knollwood Community Plan Area and the Los Angeles County Santa Clarita Valley Areawide General Plan.

The project site address is 14747 San Fernando Road, Sylmar, California. Generally, the project site is surrounded by unincorporated areas of the County to the north and west and the communities of Granada Hills and Sylmar to the south and east, respectively. The project site area includes ±494 acres in the City and ±608 acres in the County. A total ±1,102 acres is owned by the project proponent in and around Sunshine Canyon.

The project site is approximately ¾ mile southwest of the intersection of the Golden State Freeway (I-5) and Antelope Valley Freeway (SR-14) multilevel freeway interchange. More specifically, the entrance to the project site is situated ¾ mile northwest of the intersection of Balboa Boulevard and San Fernando Road in the City.

1.3 Public Hearing on the General Plan Amendment/Zone Change

On Thursday, October 29, 1998, an approximate 5 hour public hearing for the proposed Sunshine Canyon Landfill Project was held before the City Hearing Examiner at the John F. Kennedy High School in Granada Hills. The purpose of this hearing was for the Hearing Examiner to receive and consider all testimony relative to the proposed project, as well as consider the merits of the application of the project proponent as it relates to the existing environmental and land use regulations.

The Hearing Examiner will be preparing a report, which will include a recommendation that will be considered by the City Planning Commission during Spring 1999.

1.4 Notification for the Public Hearing

Sixty surrounding area owners and/or occupants were provided notification by mail of the public hearing. The public hearing notice was sent by the City on October 7, 1998. In addition, approximately 8,700 owners/occupants located within a 2-mile radius of the landfill site were sent notices in a separate mailing in order to be consistent with the property owner/occupant distribution for the Draft and Final SEIR. (A copy of this notice is included in the Public Hearing Reference Materials [Attachment A] and a copy of the property owners/occupants mailing list and statement of mailing is included in Attachment B).

In addition, public notice of the hearing was placed in the *Metropolitan News* and *The Los Angeles Times* newspapers and published on October 2 and 21, 1998, respectively. Public notice was also placed in *The Signal & Saugus Enterprise* on October 21, 22, and 23, 1998. (Copies of the newspaper proofs of publication are included in Attachment C of the Public Hearing Reference Materials.)

1.5 Attendance at the Public Hearing

A sign-in station was set up at the entrance of the auditorium where the public hearing was held, and all attendees were encouraged to sign in. Based on the number of speaker cards completed, approximately 60 individuals spoke during the public hearing. The Public Hearing Contact Database is included in Attachment D of the Public Hearing Reference Materials. Attachments E, F, and G, respectively, include the written transcript of the public hearing and a list of commenters who provided verbal comments during the public hearing, the written correspondence and information received during the public hearing and a list of the commenters, and the written correspondence information received after the public hearing (from October 30 through December 3, 1998).

1.6 Library Distribution of Previous Documents

Prior to the October 29, 1998 public hearing for the proposed project held by the City Hearing Examiner, several documents were distributed to area libraries for public review. These include the Draft Subsequent Environmental Impact Report distributed July 21, 1997; the Final Subsequent Environmental Impact Report distributed on June 26, 1998; and the General Plan Amendment Zone Change Report which was prepared to address written and verbal comments raised at the Key Group Meeting/Open House on November 18, 1997. These documents are available at the following libraries:

Culver City Library

Michael Masliah, Government Documents Librarian
4975 Overland Avenue
Culver City, CA 90230

Los Angeles Public Library

Granada Hills Branch
Dara Eklund, Adult Librarian
10640 Petit Avenue
Granada Hills, CA 91344-6452

Los Angeles Public Library

Canoga Park Branch
Renee Ardon, Branch Librarian
7260 Owensmouth Avenue
Canoga Park, CA 91303-1529

Los Angeles Public Library

Mid-Valley Regional Branch & Bookmobile
Headquarters
Dan Dupill, Senior Librarian
16244 Nordhoff Street
North Hills, CA 91343-3806

Los Angeles Public Library

Central Library
Science, Technology & Patents Department
630 West Fifth Street
Los Angeles, CA 90071

Los Angeles Public Library

Northridge Branch
Yvonne Wong, Adult Librarian
9051 Darby Avenue
Northridge, CA 91325-2743

Los Angeles Public Library

Chatsworth Branch
Leslie Chudnoff, Young Adult Librarian
21052 Devonshire Street
Chatsworth, CA 91311-2314

Los Angeles Public Library

Platt Branch
Sherry Van Sickle, Librarian II
23600 Victory Boulevard
Woodland Hills, CA 91367

Los Angeles Public Library

Encino-Tarzana Branch
Diana Lisignoli-Cochran, Senior Librarian
18231 Ventura Boulevard
Tarzana, CA 91356-3630

Los Angeles Public Library

Porter Ranch Branch
Lina Daukas, Senior Librarian
11371 Tampa Avenue
Porter Ranch, CA 91326-1729

❖ **INTRODUCTION** ❖

Los Angeles Public Library

Sylmar Branch

Kelly Burks, Acting Senior Librarian

13059 Glen Oaks Boulevard

Sylmar, CA 91342

Los Angeles Public Library

Woodland Hills Branch

Michael Eisenberg, Branch Librarian

22200 Ventura Boulevard

Woodland Hills, CA 91364-1599

San Fernando Library

Judith Babka, Library Manager

1050 Library Street

San Fernando, CA 91340

Valencia Library

Ms. J. Riaz, Manager

23743 West Valencia Boulevard

Valencia, CA 91355

2.0 RESPONSES TO COMMENTS

2.1 Introduction

Both verbal and written comments received during the public hearing (October 29, 1998) and subsequent written comments received by City staff (October 30 through December 3, 1998) are responded to within this section. Verbal comments received as testimony are presented in the order received and responded to in Section 2.3 within this document. Section 2.4 provides responses to written comments submitted during the public hearing and Section 2.5 provides responses to written comments submitted after the close of the public hearing through December 3, 1998.

To the extent applicable, the verbal and written comments received during/after the public hearing are responded to by the following topical issue responses, which are enhancements or additions to the topical responses included within the certifiable Final SEIR, Section 3.2 (June 1998). In the course of reviewing and responding to the written comments on the Draft SEIR (July 1997), the Key Group Meeting/Open House (November 18, 1997) for this proposed project, and the recent public hearing regarding the General Plan Amendment/Zone Change, certain topical issues emerged more than once and are addressed here in these Topical Issue responses to comments. Specific areas of concern are summarized at the beginning of each Topical Issue with responses to those issues. Comments that are not covered by these Topical Issues are responded to separately for the respective commenter within the matrix of comments and responses in Sections 2.3, 2.4, and 2.5.

Topical Issue 1: Seismicity

Questions have been raised regarding the design of the proposed City/County Landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems.

Response:

Two east-west trending, eastward-plunging folds were mapped within the site area and are shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. The Oat Mountain Syncline lies in the southern portion of the site, adjacent to the Pico Anticline, which lies to the north. The coincidental occurrence of inclined rocks and steep topography has resulted in dip-slope conditions (e.g., a slope of the land surface that is roughly parallel to the dip of the underlying rocks) within Sunshine Canyon. In the main canyon of the project site, a dip-slope condition exists for north-facing slopes, while in adjacent canyons to the south, dip-slope conditions exist on south-facing slopes. The varying orientations of the dip slopes are a result of the broad anticlinal fold that traverses the northern and central portions of the project site.

The Sunshine Canyon City/County Landfill will be designed to the same stringent standards as the Sunshine Canyon County Extension Landfill and the City of Los Angeles Lopez Canyon Landfill. The Sunshine Canyon County Extension Landfill design was subject to intense scrutiny by a battery of experts including the California Department of Water Resources, Division of Engineering, Civil Engineering Branch, and was found to be able to resist the "Maximum Credible Earthquake" which is the maximum anticipated earthquake given the currently known tectonic framework. The Lopez Canyon Landfill liner system withstood the Northridge earthquake with no damage. Due to the more favorable topography of the City/County site, the resistance to strong shaking of the City/County Landfill will be as great, if not greater than, that of the other

two facilities, the Sunshine Canyon County Extension and the Lopez Canyon landfills (See Topical Issue 2, below for further discussion of landfill stability during Northridge Earthquake).

With respect to ground faulting, detailed studies indicate that no active faults have ruptured the ground surface at the project site in at least 11,000 years, the time frame specified in USEPA and California regulations as necessary to consider a fault not active.

Several inactive faults in the vicinity of the project site have been mapped by various consulting geologists.¹ The orientations and direction of movement of the inactive faults on the project site, as well as their proximity to the Santa Susana thrust fault system, suggest that they all may be related tectonically. A group of faults with a northeasterly trend is clustered in the southeastern portion of the project site. These faults are delineated by offset beds and the faulted contact between the Towsley and Pico Formations, and were shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. Another group of faults lies in the northern portion of the site as shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. The northern fault traces have an east-west trend. The proximity of the three northern fault traces indicate that they may, in part, be the same fault. These faults were mapped by different geologists² and may have been located slightly in error between various authors' maps (Richard B. Saul, State Geologist, personal communication). The longest fault trace in the northern part of the site was examined closely by Geolabs (1981). It reported the fault to be gently northward dipping with features indicative of both large-scale and minor reverse-slip offsets. The fault becomes a bedding-plane fault in a westward direction. There is no evidence to indicate that this fault is active.

Professional geologists conducted a trenching investigation in 1982 in addition to a seismic survey at several localities along the fault trace and determined that the fault is not active.³ When these trenches were open, exposing the fault plane, independent inspection by a private consulting geologist (formerly of the State Water Resources Control Board [SWRCB]) and a geologist from the California Division of Mines and Geology (CDMG) also determined that the suspected fault showed no evidence of being active (Dr. Alvin L. Franks, Consulting Geologist, written communication, 1982; Richard B. Saul, State Geologist, written communication, 1982).⁴

All of the fault traces found on the project site are not traceable across streambed alluvium where they cross gullies, indicating that they are at least older than those deposits. In addition, no other features indicative

^{1/} *Geology of Southeastern Ventura Basin, Los Angeles County, California*, U.S. Geological Survey Professional Paper 334-H, E.L. Winterer and D.L. Durham, pp. 275-336, 1962. *Geologic Map of the San Fernando Earthquake Area*, A.G. Barrows, J.E. Kahle, R.B. Saul, and F.H. Weber Jr., in *San Fernando, California, Earthquake of 9 February 1971*: California Department of Conservation, Division of Mines and Geology Bulletin 196, Plate 2, ed. G.B. Oakshott, 1975a. *Geology of the S.E. 1/4, Oat Mountain Quadrangle, Los Angeles County, California*, Richard B. Saul, California Department of Conservation, Division of Mines and Geology, Map Sheet 30, 1979; *Preliminary Geotechnical Feasibility Study - Proposed Class I Disposal Site, Los Angeles, California*, Geolabs, unpublished report, February 1981.

^{2/} *Geologic Map of the San Fernando Earthquake Area*, op. cit.; and *Preliminary Geotechnical Feasibility Study - Proposed Class I Disposal Site, Los Angeles, California*, op. cit.

^{3/} *Sunshine Canyon Project Reflection/Refraction Seismic Survey*, Gasch and Associates. 1982.

^{4/} *FEIR Sunshine Canyon Landfill Extension. Appendices*, Volume IIA, Ultrasystems Engineers & Constructors, Inc., Appendix B, Geology Technical Report, Exploratory Boring and Trench Logs, p. 11. April 1989.

of recent faulting (e.g., fault scarps or offset structures) were detected from field investigations and detailed analyses of aerial photographs. The deformation that produced the folds and faults within the site area may have taken place during the mid-Pleistocene period (750,000 to 125,000 years ago). The local geologic features that formed during the Pleistocene deformation include the Pico Anticline, Oat Mountain Syncline, and most or all of the mapped faults on the site.⁵ The overall east-west trends of the resulting geomorphic features were produced by north-south crustal shortening.

Figure 4.1-5 in the Draft SEIR depicts regional earthquake faults, and Figure 4.1-6 shows the tectonic setting of the project site. Active and potentially active faults that have the potential to generate significant strong ground motions at the site include the Santa Susana, San Fernando-Sierra Madre, San Gabriel, and Northridge Blind Thrust Faults in the near field (less than 6 miles from the site); the Simi-Santa Rosa, Oakridge, Elysian Park, and Malibu Coast-Santa Monica-Raymond Faults in the midfield (between 6 and 20 miles from the site); and the Whittier-North Elsinore and San Andreas Faults in the far field (greater than 20 miles from the site). The most important of these sources with respect to the intensity of strong ground motions at the site are the Santa Susana, San Fernando-Sierra Madre, and Northridge Blind Thrust Faults near field sources, and the San Andreas far-field source.

The San Fernando-Sierra Madre Fault, with a site-to-source distance of 3.0 miles and the closest fault to the project site, was the source of the 1971 San Fernando earthquake (Magnitude [M] 6.6). This fault stretches approximately 52 miles along the base of the San Gabriel Mountains from the vicinity of the Newhall Pass southeasterly toward San Bernardino. The northwestern end of this fault ruptured in 1971. Ground rupture associated with the San Fernando earthquake of 1971 is known to have occurred throughout the San Fernando Valley region. Two such occurrences lie east of the project site across San Fernando Road and the I-5 Freeway. Offsets of between 2.4 to 3.9 inches were detected after this event. For this reason, the most recent version of the Alquist-Priolo Special Study Zone (SSZ) map (Oat Mountain Quadrangle, 1976) had extended the SSZ boundaries westward into the Sunshine Canyon site and were depicted on Figures 4.1-4 and 4.1-7 in the Draft SEIR. However, studies by consulting geologists in 1982 and 1988 and inspections by independent geologists all concur that there is no evidence of active faulting onsite. It is also significant to note that neither of the faults located across the I-5 Freeway, easterly of the project site (showing movement in the 1971 earthquake event), were found to displace the alluvium in the San Fernando Pass area, suggesting that they do not extend onto Sunshine Canyon. Additionally, the landfill sustained no physical damage in 1971 as a result of that earthquake.⁶

The Santa Susana Fault is a steeply dipping thrust fault that passes beneath the site at a depth of between 3.1 and 6.2 miles. The shortest distance between the ground surface at the project site and the Santa Susana Fault is approximately 3.1 miles. This is referred to as the “site-to-source” distance used in evaluating the intensity of ground motions expected at the site should an earthquake occur on the Santa Susana Fault. The fault stretches approximately 17 miles from the edge of the San Gabriel Mountains, where it interacts with the San Fernando-Sierra Madre Fault, westward into Ventura County. The Santa Susana Fault is a complex structure with numerous strands mapped by field investigators. The eastern edge of the Santa Susana Fault,

^{5/} “Geology of the Southwest Slope of the Santa Susana Mountains and Geologic Effects of the San Fernando Earthquake,” Richard B. Saul in *San Fernando, California Earthquake of February 1971*, California Department of Conservation, Division of Mines and Geology Bulletin 196, ed. G.B. Oakshott. 1975.

^{6/} *FEIR Sunshine Canyon Landfill Extension, Appendices*, Volume IIA, Appendix B, Geology Technical Report, Exploratory Boring and Trench Logs, op. cit., p. 10.

where it interacts with the San Fernando-Sierra Madre Fault, was active during and following the 1971 San Fernando earthquake, and that fault may have been the source of the 1893 Pico Canyon earthquake (Yeats, 1987). Yeats et al. (1993) divided the fault into three discrete segments, each of which could rupture independently.

The San Gabriel Fault, with a site-to-source distance of approximately 5 miles, is the closest major fault (capable of an earthquake of M 7.0 or greater) to the site. Regional geologic studies of the San Gabriel Fault led to the conclusion that it is the ancestral segment of the San Andreas Fault within the Transverse Ranges. Although abandoned as the primary dislocation between plate boundaries in Pliocene time, offset geologic units indicate right lateral slip on the order of 0.6 mile within Quaternary time. Evidence of dip slip is also documented but is likely only localized. The fault trace extends for approximately 45 miles and is capable of generating up to M 7.0 earthquakes. The CDMG has suggested the San Gabriel Fault may also be a possible source of the 1893 Pico Canyon earthquake.

Seismic hazards that must be considered at the Sunshine Canyon site include primary fault rupture, secondary ground rupture, and strong ground shaking.

Based on the above cited data, the potential for primary fault rupture within the boundaries of Sunshine Canyon is considered minimal. The faults that intersect the ground surface onsite do not display evidence of Holocene movement (e.g., within the last 11,000 years), indicating they are inactive. One relatively major inactive fault has been exposed to date during excavation for the County Landfill. This inactive fault, located in the ridge between the northwest and north canyons, was recognized and shown on site geologic maps prior to landfill development. These site geologic maps do not indicate that any major inactive faults would be exposed during construction of the proposed City/County Landfill. However, all excavations would be mapped by a professional geologist, and any inactive faults encountered during excavation would be recognized and shown on site geologic maps. Additionally, the mapped geology would be field checked by a Los Angeles Regional Water Quality Control Board (LARWQCB) geologist prior to placement of any engineered fill or liner in the excavated areas. Based on observations of ground rupture in the vicinity of the I-5/SR-14 Freeway interchange following the San Fernando earthquake (1971), the Alquist-Priolo SSZ demarcating the 1971 fault rupture extends west across the I-5 Freeway and onto the project site at its northern extremity and was shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. However, extensive field investigation, including geologic mapping and logging of exploratory trenches by both consulting geologists and CDMG representatives, indicates that fault rupture from the 1971 San Fernando earthquake did not occur within the boundary of the project site and that known fault traces within the site boundaries show positive evidence that there has not been fault displacement onsite in Holocene time.

No analytical methods are available to estimate either the potential of occurrence of secondary ground rupture or its magnitude. Therefore, for design purposes, the potential for secondary ground rupture in the epicentral region (the area above the buried fault plane) must be evaluated by comparison to observations of past earthquakes. Based on the observations of secondary ground rupture in the Northridge earthquake, vertical displacements due to secondary ground rupture on the order of 4 to 8 inches could occur within Sunshine Canyon in the event of a major earthquake on a thrust fault underlying the site.

The design of a landfill above a thrust fault accommodates the ground deformation associated with thrusting (i.e., development of folds and fractures). This is referred to as secondary ground rupture. In comparison with other types of faults, design models for predicting the effects of thrust faults are somewhat different.

Thrust faults are neither more nor less dangerous than other types of faults with respect to the integrity of the liner and environmental control systems.

Seismic activity occurring in the site vicinity can produce strong ground shaking, which could result in damage to the landfill waste containment system, due to seismically induced displacement of the waste mass, if these systems were designed, engineered, or installed incorrectly. Strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment and surface water control systems. Landfill containment systems are broadly defined in this respect to include the liner, cover, leachate collection and removal system (LCRS), and gas extraction system. Surface water drainage systems include drainage channels, down drains on slopes, and sedimentation/stormwater retention basins. Seismic design of the landfill system includes providing mitigation for landslide potential by appropriate grading of the waste mass and natural slopes, designing the containment system to resist the effects of strong shaking, providing an emergency response plan to mitigate damage to containment systems that may occur (e.g., cracking of pipes or drainage channels, loss of power), and providing redundant systems where damage is not readily observable or repairable (e.g., use of a composite liner system).

In summary, no cumulative impacts for seismic exposure are anticipated. No primary fault rupture or significant slope displacement due to strong ground motions is expected. It is not anticipated that the landfill would create seismic-related risks to other local area land uses. Nonetheless, a regional earthquake of high magnitude could temporarily impact landfilling operations and other projects in the regional area; however, any disruption to the proposed landfill facility (e.g., cracked concrete lining of drainage structures, broken gas collection pipes, power loss, office building damage) will be repaired immediately by the project proponent.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.1.4, Geologic Hazards-Seismicity, pp. 4-40 and 4-41, no significant impacts would occur. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 2: Landfill Stability During Northridge Earthquake

Questions have been raised regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake. Additionally, the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake have been questioned.

Response:

The Northridge earthquake occurred on January 17, 1994 (at 4:30 a.m. local time), and the main shock of the earthquake was centered near Northridge. This event was assessed by the University of California at Berkeley seismographic station to have a moment magnitude (M_w) of 6.7. Damage resulting from the earthquake was widespread within Los Angeles County. Damage in the epicentral region included the collapse of highway structures, damaged and/or destroyed residential and commercial structures, widespread disruption of utilities and other facilities, and numerous landslides.⁷

^{7/} Preliminary Report on the Principal Geotechnical Aspects of the January 17, 1994, Northridge Earthquake, eds. (continued...)

The performance of Class III nonhazardous landfills in the Southern California area affected by the earthquake was excellent. Several landfill facilities were subjected to peak bedrock accelerations of 0.2 to over 0.5 g. No landfills affected by the Northridge earthquake showed any physical signs of major instability, although several facilities experienced minor levels of lateral deformation and/or cracking at the surface. Additionally, many landfills experienced a temporary shutdown of their gas flare systems due to the loss of power after the earthquake.⁸

At the inactive landfill in the City, longitudinal cracks were observed along the top of the waste fill where it interfaces with the natural canyon walls. These cracks varied in width from less than 0.8 inch to as much as 12 inches wide, exhibiting in some areas 6 to 12 inches of differential vertical offset. This cracking did not appear to represent any threat of overall instability to the integrity of the landfill. Instead, cracking may have been caused by the differential settlement of the waste fill itself, which occurred as a result of the earthquake shaking.⁹ During this period, the landfill gas (LFG) extraction system was temporarily shut down due to a loss of power. Power to the LFG collection and flaring system was restored 2 days after this seismic event. No damage to the landfill's ancillary structures resulted.

Detailed landslide mapping from aerial photographs by the U.S. Geological Survey (USGS, 1995b) indicated that no significant earthquake-induced landslides occurred at the project site. However, the USGS map does show several small landslides within the footprint of the approved County Landfill (this landfill was not operational at the time), generally located in steep canyons adjacent to the major drainage area. In addition, a relatively concentrated accumulation of landslides occurred along the south-facing slopes of Aliso Canyon, south of the project site. This is consistent with previous postearthquake reconnaissance surveys of Sunshine Canyon where several small earthquake-induced or reactivated landslides were observed in both County and City areas of the project site. Several rockfalls occurred on steep bedrock cliffs, including one located within the ±100 acre open-space area, south of the inactive City Landfill.

The Northridge earthquake produced no significant adverse impacts on the proposed project site. No cracking or deformation in the waste mass was found at the base of the existing inactive landfill by consulting geotechnical engineers or the University of California at Berkeley's reconnaissance team. The minor cracking observed was limited to the landfill's surface cover area, and no waste was exposed. This cracking was repaired immediately by placing additional cover material over the cracks. Similarly, no significant seismically induced displacement was observed in the natural slopes surrounding the existing inactive landfill.

The performance of the existing landfill in the Northridge earthquake and observations of the performance of other solid waste landfills in major earthquakes indicate that solid waste is extremely resistant to the effects of strong ground motions and is not susceptible to loss of strength or large internal displacements due to earthquake shaking (as is the case for some earthen materials, e.g., loose, saturated sand). Therefore, the waste mass of the existing landfill and solid waste placed within the proposed fill areas is expected to

^{7/} (...continued)

Jonathan P. Stewart, Jonathan D. Bray, Raymond B. Seed, and Nicholas Sitar, University of California at Berkeley, Earthquake Engineering Research Center Report No. UCB/EERC, p. 1. June 1994.

^{8/} Ibid., p. 200.

^{9/} Ibid., p. 218.

perform well when subjected to strong shaking from earthquakes, with no loss of strength and little internal deformation.

In regard to other solid waste landfills after the Northridge earthquake, cracks were observed in all waste cells of the Chiquita Canyon Landfill. Tears were also discovered in the landfill liner. They were caused by a combination of factors, including stress concentrations and inadequate shear resistance at the base of the landfill. The tears occurred adjacent to an anchor trench at the crest of a slope where the largest static (preseismic) stresses in the high-density polyethylene (HDPE) geomembrane would be expected as a result of the settlement and compaction of the waste fill. This is generally recognized as one of the locations where the stress on the liner is the greatest. The tear initiated from the corner of a rectangular "cutout" where a quality assurance/quality control (QA/QC) sample was collected during construction for destructive testing. Rectangular holes in the liner are points of stress concentration. A smooth liner was used at the base of the landfill, providing inadequate shear resistance to restrain the base from sliding, thereby resulting in a large deformation. Several feet of sliding displacement at the base resulted in slumping along the side slope, and additional stress was applied to the liner in the vicinity of the rectangular cutout. For additional information, refer to the Draft SEIR, Appendix C16, Assessment of the Performance of Class III Nonhazardous Solid Waste Landfills in Recent Earthquakes.

The Lopez Canyon Landfill liner system performed extremely well during the Northridge earthquake and sustained no damage despite being subjected to stronger shaking than the Chiquita Canyon Landfill. A similar liner design for the Sunshine Canyon County Landfill was used. Measures used in the design of the Lopez Canyon Landfill liner system that prevented rupture or tearing of the liner system included anchor trenches used above or outside (laterally) of the waste for temporary anchorage and abandoned whenever the landfill was expanded laterally or vertically, no destructive samples collected within 5 feet of the crest or toe of a slope or an anchor trench, and a textured liner at the base of the landfill to limit permanent seismic displacement to less than 12 inches. Similar design methods would be incorporated for the City/County Landfill. For additional information, refer to the Draft SEIR, Appendix C16, Assessment of the Performance of Class III Nonhazardous Solid Waste Landfills in Recent Earthquakes.

Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions

Concerns have been raised regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills.

Response:

The discussion of local wind patterns was included in the Draft SEIR in accordance with data provided in *A Climatological Air Quality Profile, California South Coast Air Basin (SCAB)* (South Coast Air Quality Management District [SQAQMD], January 1980), as well as data and methodology provided in the *CEQA Air Quality Handbook* (SQAQMD, April 1993).

As stated in the Draft SEIR, Section 4.2.2, California's SCAB Regional Climate Conditions, p. 4-47, during the winter months the project area experiences a frequent wind flow from the north and northwest through the Newhall Pass into the western San Fernando Valley. These winds predominate between 11:00 a.m. through 5:00 p.m. The speeds (16.5 mph average in the Newhall Pass) reflect the influence of Santa Ana winds, which are strongest during those hours of the day and blow in a similar direction. Onsite

measurement has shown the overall average wind speed to be 9.9 mph with a maximum 1-hour measurement of 45 mph. It should be noted that the overall average wind speed and maximum 1-hour wind speed do not preclude the presence of very low or high wind speeds, especially during Santa Ana conditions.

The National Weather Service's description of Santa Ana winds includes the following:

Santa Ana winds are generally defined as warm, dry winds that blow from the east or northeast (offshore). These winds occur below the passes and canyons of the coastal ranges of Southern California and in the Los Angeles Basin. Santa Ana winds often blow with exceptional speed in the Santa Ana Canyon (the canyon from which it derives its name). Forecasters at the National Weather Service in Oxnard and San Diego usually place speed minimums on these winds and reserve the use of "Santa Ana" for winds greater than 25 knots (or approximately 29 mph).

The complex topography of Southern California combined with various atmospheric conditions create numerous scenarios that may cause widespread or isolated Santa Ana events. Commonly, Santa Ana winds develop when a region of high pressure builds over the great basin (the high plateau east of the Sierra Mountains and west of the Rocky Mountains including most of Nevada and Utah). Clockwise circulation around the center of this high pressure area forces air downslope from the high plateau. The air warms as it descends toward the California coast at the rate of 5 degrees Fahrenheit per 1,000 feet due to compressional heating. Thus, compressional heating provides the primary source of warming. The air is dry since it originated in the desert, and it dries out even more as it is heated.

Santa Ana winds commonly occur between October and February with December having the highest frequency of events. Summer events are rare. Wind speeds are typically north to east at 35 (approximately 40 mph) knots through and below passes and canyons with gusts to 50 knots (approximately 58 mph). Stronger Santa Ana winds can have gusts greater than 60 knots (approximately 69 mph) over widespread areas and gusts greater than 100 knots (approximately 115 mph) in favored areas. Frequently, the strongest winds in the Basin occur during the night and morning hours due to the absence of a sea breeze. The sea breeze which typically blows onshore daily, can moderate the Santa Ana winds during the late morning and afternoon hours.¹⁰

Dust from construction activities, including physical site disturbance, material deliveries, employee commuting, and potential wind erosion during high wind episodes, may create a visual and soiling nuisance beyond the property line. Because dust impacts are expected to be significant during the construction phase, standard mitigation measures (by project design) will be implemented to control fugitive dust emissions during construction as required by SCAQMD Rules 402 (Nuisance) and 403 (Fugitive Dust).

In addition, fugitive dust emissions in combination with PM₁₀ emissions generated from vehicular exhaust are anticipated to create a significant impact. Past operations have shown that the higher-elevation upper plateau and southern berm areas of the existing inactive landfill have experienced greater wind-generated

^{10/} "Santa Ana Winds." www.nimbo.wrh.noaa.gov/sandiego/sanwind.htm; INTERNET.

fugitive dust occurrences than the lower elevations within the canyon. However, the project proponent has successfully implemented enhanced soil treatment measures to stabilize soil conditions and further enhance onsite revegetation.

In addition, fugitive dust emissions in combination with particulate matter less than 10 microns in diameter (PM₁₀), generated from vehicular exhaust, are anticipated to create a significant impact.

The closest residential area in the community of Granada Hills to the proposed landfill footprint would be approximately 1,700 feet away (with the exception of several residential trailers located about 700 feet east of the project site). During high wind events, monitoring of weather conditions is conducted by BFI personnel stationed in the existing environmental control center. Weather information is conveyed by radio transmission from environmental control system personnel to the BFI foreman and the onsite construction contractors and/or operating personnel. The BFI foreman has control over construction activities and landfilling operations, and he has the authority to cease construction activities and/or close the landfill if warranted.

It should be noted that the Applicant will also use soil sealant which has been proven to effectively control fugitive dust emissions. The soil sealant is a nonpetroleum, high-bonding-strength emulsion developed specifically for dust and erosion control. Selected fractions of natural tree resins are combined into a strong and versatile bonding agent. The soil sealant is a biocatalyst formulation designed to improve the resistance to erosive forces of traffic and weather. The soil sealant is supplied as a highly concentrated liquid catalyst and applied in dilute water solutions.

The soil sealant treatment enables water to rapidly wet and penetrate soils. Treatment of soil materials facilitates the achievement of the highest density possible with available compaction effort. The soil sealant increases cohesion of water with soil and between soil agglomerates. Improved bonding of water with soil during construction retards evaporation and reduces the volume of water required for compaction. Increased cohesion in soil and aggregate mixtures makes them easier to process and handle with construction equipment and reduces segregation problems. The soil sealant increases density in compacted soils and aggregate mixtures over that achieved when working only with water. The soil sealant treatment directs an alignment of soil particles and soil agglomerates during processing and compaction that cures into a structure with increased density, cementation, and bearing strength. Unpaved surfaces are hardened against the abrasive effects of traffic and against the erosive effects of wind and water.

Water trucks are currently used to apply soil sealant at the project site. The soil sealant solution is blended into the soil and standard depths of treatment range from 6 to 12 inches. Thorough mixing and blending are essential to ensure uniform dispersion of the solution. A grader would be used to manipulate the mixture until it is uniformly wetted and blended. Compaction is essential for the effectiveness of the soil sealant treatment. After soil is blended to an optimum moisture content with the soil sealant solution, a compactor would be used to thoroughly compact the treated material. Perimeter drainage would be provided to maximize water flow off of and away from the stabilized area.

The soil sealant requires no special safety precautions in handling or storage and will not harm personnel or equipment. The soil sealant is supplied as a liquid concentrate in 55-gallon sealed plastic drums. The sealant is both nonhazardous and nonflammable.

❖ RESPONSES TO COMMENTS ❖

The following mitigation measures will reduce fugitive dust emissions during construction activities at the project site:

- Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and control is required.
- Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.
- Graded areas shall be watered as necessary to reduce dust emissions.
- Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation plan. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.

The following mitigation measures will reduce fugitive dust emissions during operational activities at the project site:

For truck travel and fugitive dust emissions, mitigation shall include:

- To minimize fugitive dust emissions, the access roadways shall be paved as necessary and haul roads to the working face areas shall be hard packed and/or covered with gravel a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.

For paved roads, mitigation shall include:

- Curbs and gutters will be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice-daily cleaning, a control efficiency in excess of 90 percent is predicted.

For unpaved clay roads, mitigation shall include:

- An SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas during windy periods. Note that this control efficiency is less than (i.e., more conservative than) the 95 percent value used at the El Sobrante Landfill (Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements El Sobrante Landfill Expansion, TRC Environmental Solutions, Inc., May 2, 1997).

For unpaved crushed stone covered roads, mitigation shall include:

- With the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.

Mitigation pertaining to heavy equipment operations shall include the following:

- Operations shall be restricted to encompass no more than a 10-acre active working face area.
- To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.

Additionally, mitigation pertaining to site erosion shall include the following:

- Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.
- A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.
- An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.

With the implementation of the above-referenced mitigation measures for the proposed City/County Landfill, significant impacts from fugitive dust emissions would be substantially reduced.

In addition, refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality and Appendix D4, Revisions to Draft SEIR, Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary in the Final SEIR.

Topical Issue 4: Landfill Gas Generation and Odor Control

Concerns have been raised that the proposed City/County Landfill would generate substantial volumes of LFG, resulting in the potential for odor migration onto sensitive land uses.

Response:

Odors can occur when the landfill surface, due to differential waste settlement, subsidence, or cracks, allows the LFG to escape into the atmosphere. At the existing inactive City Landfill, cracks found on the landfill surface are filled as part of a continuous maintenance program. A similar procedure would be performed at the proposed landfill footprint area.

The proposed LFG collection and flaring system would be installed to collect gases generated by the decomposition of refuse through a series of horizontal and vertical gas collector wells designed to minimize

the potential of onsite and offsite gas emissions and odors. The proposed LFG collection and disposal system will consist of gas extraction wells and piping. This system will be constructed of polyethylene pipe, which will flex as differential settlement occurs at the landfill. Once LFG is generated, it will be drawn into the horizontal collectors or wells and subsequently to the collection piping system by the vacuum blowers. To avoid drawing air into the system, the gas is extracted at the same rate it is being produced by controlling the vacuum level in the piping system. Extraction wells will be spaced so that the volume of refuse influenced by the wells is sufficiently balanced to capture the maximum amount of gas being generated by the landfill. The wells will be located so that the area of well influence will slightly overlap that of the adjoining wells. Furthermore, the collection system piping would be sized so that sufficient vacuum is available to all wells in the system (see Draft SEIR, Figure 2.7-7).

The horizontal gas collection system will be installed when preparing each new cell area and will be expanded as necessary to ensure compliance with SCAQMD Rule 1150.1 (Control of Gaseous Emissions from Active Landfills).

The monitoring of surface and ambient air quality is a continuous process required by the SCAQMD throughout the site life of the landfill and during its closure and postclosure maintenance period. Both the LFG collection and flaring system and sampling program for the proposed landfill will require approval by the SCAQMD. Surface sampling is used to identify areas of the landfill where gas may be escaping.

With respect to odors, the landfill must not be a source of odor nuisance per the requirements of CCR, Title 27, §20919. The project proponent would prepare and implement an odor abatement program, which would be approved by the designated City of Los Angeles Local Enforcement Agency (City LEA). The program would ensure that odor levels within the facility are kept within baseline odor standards and that odors emanating from the facility would not exceed any odor detection thresholds at the property boundaries. The best method for ensuring that there will be no odor generation is by proper compaction and coverage of all solid waste materials by the end of the working day. Refuse received at the proposed landfill would be properly disposed within one hour of receipt, compacted, and covered with a minimum layer of 6 inches (i.e., State standard) of compacted soil cover material or an approved alternative daily cover by the end of the working day; therefore, the potential for odors is substantially reduced. The odors that may be released directly from the refuse prior to being covered with cover material are usually at low levels and are dispersed in the atmosphere at levels of concentration below which they do not create a nuisance to local receptors. The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain so that no odor nuisance from refuse emplacement should occur.

No "Notices of Violation" for odor have ever been issued by the AQMD at either the inactive City Landfill or the currently operating County Landfill. The AQMD indicated that the inactive City Landfill was not the source of previous resident odor complaints when it was in operation during the late 1980s, and that the primary odor source was from naturally occurring sulfur and existing oil well and gas injection storage operations at Aliso and Cascade Oil Fields. Existing odor control procedures used onsite at the County Landfill are effective in controlling refuse odors.

The following mitigation measures would be implemented as part of a comprehensive odor control program:

- The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the

atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.

- Operational techniques shall be used to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.
- Solid waste shall be compacted within 1 hour of its arrival at the working face.
- The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.
- If an odor problem should develop, appropriate control measures shall be implemented. These measures include applying daily cover material or more frequent application of the cover material to seal the landfill surface, or making adjustments to the wells, equipment, and operation of the LFG collection and recovery system.
- To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include:
 - Sample Probe Installation: At a minimum, one monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils.
 - Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 parts per million (ppm).
 - Ambient Air Samples: Twenty-four-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.
 - Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.
 - Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required

by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.

- LFG flaring systems shall be sited as required by the SCAQMD and constructed using best available control technology (BACT). The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City LEA. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.

With the implementation of City Mitigation Measures in the Draft SEIR, Section 4.2.13, Odor Impacts, pp. 4-94 through 4-96, no significant impacts from odors would occur.

Topical Issue 5: Stormwater Runoff Control Measures

Questions have been raised regarding the project proponent's ability to control and contain stormwater runoff so that contact between stormwater and the landfill will be avoided.

Response:

Implementation of the proposed project would result in a net change (or diversion) to existing drainage patterns, hydrologic conditions, and quantities within the site through alterations to the site topography. However, alterations to and discharges from the project site will be minimal due to implementation of surface water control measures. Construction grading and the removal of surficial vegetation would remove existing barriers that currently act to dissipate (i.e., slow down and reduce) stormwater runoff from the site. As a result, if surface water control measures are not implemented, the proposed project has the potential to increase the stormwater runoff and peak discharge, increase erosion and sediment transport, and decrease surface water quality due to increased sediment loads. The recommended mitigation measures provided in the Draft SEIR, pp. 4-113 and 4-114, require the project proponent to make improvements consisting of surface water drainage channels, interceptor ditches, pipelines, and sedimentation basins. These proposed features will collect, direct, and safely convey stormwater runoff around the landfill site and route runoff into regulated sedimentation basins. Figure 4.3-2 of the Draft SEIR shows the proposed site drainage plan. Moreover, these features will be designed and constructed to minimize ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping.

CCR, Title 27, §20260 requires that drainage and sediment control structures (e.g., sedimentation basins) for landfill sites be designed to handle, at a minimum, a 100-year-frequency, 24-hour storm event. The proposed City/County Landfill will be designed to accommodate a 100-year storm event. Specifically, the sedimentation basins will handle sediment and debris flow, settle out suspended soil particles, prevent silting of the downstream channel, and maintain the natural watercourse. Sedimentation basins will be located outside of proposed landfill filling areas. These basins will also attenuate surface water discharges from the site so as to not exceed the pre-development or pre-landfill peak discharge rate.

Drainage from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Stormwater runoff flows from tributary channels, and erosion caused by these flows converges at the canyon's mouth. Currently, stormwater from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Water that collects in that basin is periodically monitored under the stormwater monitoring plan for the operational

County Landfill. Drainage from this basin travels southerly into a wash before reaching the mouth of the canyon near the landfill entrance.

Offsite, stormwater from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City Department of Public Works, Bureau of Engineering (City BOE). The culvert is approximately 120 feet long and releases stormwater into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, stormwater enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County Department of Public Works (DPW), Hydrology and Water Conservation Division. Stormwater then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the U.S. Army Corps of Engineers (Corps).

The inactive City Landfill has numerous drainage control features, such as benches, interceptor ditches, and concrete drainage channels (see Draft SEIR, Figure 4.3-2), to divert stormwater runoff away from the landfill. These control improvements are maintained regularly and closely monitored during the rainy season so that any necessary repairs or maintenance can be performed in an expeditious manner. Areas of ponding or erosion damage on the existing inactive landfill are repaired upon discovery and as weather permits.

To minimize potential stormwater quality impacts, the project proponent will request coverage under the General National Pollutant Discharge Elimination System (NPDES) permit from the LARWQCB for nonpoint-source stormwater runoff. The NPDES permit regulates general construction activities and industrial activities. In general, the NPDES permit application would describe the landfill, type and quantity of wastes expected, effluent and receiving water limitations, pretreatment requirements, and monitoring programs. This permit is intended to eliminate nonstormwater discharge to existing stormwater systems, implement a water pollution prevention plan and monitoring program, and require monitoring of discharges into the localized stormwater system.

The potential exists for nonstormwater discharges into the stormwater conveyance systems. Various control measures and features described in the Draft SEIR will be used to separate stormwater from wastes being disposed of in the proposed landfill and to control sediment load, debris, and erosion impacts caused by stormwater runoff. The long-term impacts associated with development and operation of the landfill could allow potential pollutant sources to be transported into local stormwater systems. These potential impacts will be minimized by properly storing all liquids (e.g., oil, antifreeze, lubricants, or diesel fuels) necessary for the operation and maintenance of landfill equipment and reducing the potential for spills. Any onsite spills will be contained in accordance with an approved spill response plan. In addition, any fertilizers or insecticides used for revegetation purposes will be stored within the plant materials center. To the greatest extent possible, the products used will be biodegradable and nontoxic.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-113 and 4-114 for stormwater runoff, no significant impacts would occur.

Topical Issue 6: Hydrogeologic Relationship between Sunshine Canyon and the San Fernando Valley Groundwater Basin

Questions have been raised regarding the hydrogeologic connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin.

Response:

The Watermaster, MWD, DWP, and the Los Angeles Regional Water Quality Control Board (LARWQCB) all concur that the only hydrogeological connection between the natural geologic formations within Sunshine Canyon and the San Fernando Groundwater Basin is the alluvium in the axis or bottom of the canyon. They are also in agreement that some type of groundwater cutoff through the alluvium or removal of the alluvium, as proposed by BFI for construction of the composite liner system for the proposed project, combined with monitoring and the engineered leachate control systems are sufficient to mitigate potential impacts from the landfill on the San Fernando Groundwater Basin.

Data pertaining to groundwater within the Sunshine Canyon area were obtained from several prior studies of the project site and supplemented by monitoring data gathered from the monitoring well network. Borings completed at the project site have ranged in depth from 2 to 62 feet, as shown in Table 4.1.1 of the Draft SEIR. Most exploration borings and accompanying packer tests were conducted within the proposed landfill footprint area. However, several borings were purposely located outside of the landfill footprint because surface geologic features warranted further subsurface documentation. Numerous borings (C-6, C-7, C-10, C-11, and C-12) were located within unique geologic features that are known to produce higher permeabilities, such as deep-seated landslides, axis of anticlines, and ridgelines. During site exploration activities, groundwater generally was encountered in the exploratory borings (CM-1, CM-3, CM-4, CM-8, and CM-9) drilled in the canyon bottom, with one exception. Boring C-2, which was drilled to the bottom of the canyon, did not intercept groundwater. Exploratory Borings CM-3 and CM-5 do not lie in a stream gully and did encounter groundwater at depths of 40 to 50 feet. Groundwater was not encountered in the remaining exploratory borings (C-6, C-7, C-10, C-11, and C-12), although indications of previous groundwater existence were found in recovered drill core soil samples (i.e., iron and manganese staining in fractures). The borings that encountered groundwater were completed either in alluvium or colluvium where groundwater was encountered or in bedrock material, and the majority were sealed off from the near-surface alluvium and colluvium.

Groundwater at the project site generally flows in a south to southeast direction. Results of the drilling program and subsequent water level readings indicated that confined groundwater conditions may exist at numerous locations within the project site. Groundwater in the uppermost aquifer occurs under unconfined conditions in the alluvial sediments and generally under confined conditions in the top weathered zone of the Towsley Formation. The lower bedrock zone was found to occur under confined conditions. Available groundwater studies indicate that potentially limited groundwater resources lie beneath the project site.

The geologic structure works in conjunction with onsite topography to restrict groundwater movement within and down the canyon axis. With the relatively low hydraulic conductivity documented in the Towsley Formation and the hydraulic gradients at the site, groundwater velocities are low. The bedrock units are folded along the Oat Mountain syncline and the Pico anticline. To the south of the main canyon, the units generally dip to the north along the south flank of the syncline (into the main canyon), and this minimizes groundwater movement (against the dip) to the south and southeast. Northward, the bedding rolls over the

Pico anticline and dips north. Along the northern side of the main canyon, the bedrock units dip to the north, and groundwater movement is not likely to be impeded by the structure.

Within Sunshine Canyon, groundwater follows the topography and moves down slopes, continuing toward the valley axis. The primary component of groundwater flow, based on the work performed onsite, is shown to be horizontal. The vertical component of flow is highly variable over the project site. In the upper portions of the canyon where recharge is likely, a downward component of flow is suspected. In the lower portion of the canyon, there is evidence of an upward component of groundwater flow direction. This upward component is also demonstrated further downstream and near the landfill entrance.

Movement of shallow groundwater follows the direction of surface drainage. Water stored in the alluvium and shallow bedrock generally flows below grade within the canyon. Based on estimates of hydraulic conductivity using soil descriptions from boring logs, the estimated groundwater discharge velocity in the alluvium ranges from approximately 0.005 to 1 foot/day. Groundwater in the bottom of the canyon flows slowly toward the mouth of Sunshine Canyon.

Due to the pervasively folded, faulted, and anisotropic nature of the bedrock (i.e., interbedded sandstone and shale), the flow rate of groundwater at the project site can vary significantly over short distances. However, the presence of nonactive faults in addition to interbeds of low-permeability shale and mudstone tends to restrict the flow of groundwater. Subsurface water in Sunshine Canyon is effectively hydraulically separated from the San Fernando Valley alluvium by the low-permeability bedrock. Groundwater flow in the bedrock is not continuous between the canyon and valley floor area.

After independently reviewing published hydrogeologic reports for the Sunshine Canyon area, the Watermaster (i.e., the Los Angeles County Superior Court appointed hydrologist who manages the withdrawal and replenishment of groundwater supplies in the adjudicated groundwater basin) for the Upper Los Angeles River Area (ULARA) concluded that, other than through the alluvium, there was no groundwater connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin. The Watermaster also concluded that the natural bedrock material underlying the canyon is of low permeability and has low storage capability. A report prepared for the City Bureau of Sanitation (BOS) on groundwater movement in Sunshine Canyon states:

Whatever groundwater movement does occur is undoubtedly complicated and slow. Complications include the bedding, which, although generally dipping towards the east in the lower canyon, dips steeper than the hydraulic gradient making it necessary for the groundwater to move across the bedding. Interbeds of siltstone and shale act as subsurface dams with little or no permeability. Groundwater quality is poor.¹¹

The alluvial soils within the canyon have generally been found to have a higher permeability and capability of transmitting fluids than the bedrock. In that regard and similar to the operational County Landfill, the foundation base-grade elevations for the proposed landfill would be prepared by excavating all alluvium, weathered rock, and other unsuitable foundation materials followed by the installation of several environmental protection and control systems, such as the gravel subdrain system, compacted soil foundation

¹¹/ *Hydrology of Sunshine Canyon North Valley Landfill Site*. Robert T. Bean, Consulting Geologist. Unpublished report, July 28, 1978.

layer, liner system, LCRS, surface and water drainage controls, and other features. Therefore, no contact between deposited refuse and alluvial soils would occur as a result of proposed landfill development.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to Waste Discharge Requirements (WDRs), liquids can be subsequently used onsite for landscape irrigation, dust control, or other non-emergency uses.

It is anticipated that the proposed City/County Landfill would not impact imported drinking water or domestically produced drinking water (e.g., from local area wells) since the nearest spreading ground is the Hansen Spreading Ground located approximately 5 miles southeast of the project site. No impacts on this spreading ground are anticipated as a result of project development. In addition, surface water runoff from the project site is safely conveyed into the City's flood control system, which connects with the County's flood control system. No significant impacts to beneficial uses of groundwater of the San Fernando Groundwater Basin would occur as a result of the development of the proposed City/County Landfill. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 7: Groundwater Protection

Questions have been raised regarding whether the monitoring systems required for the proposed City/County Landfill would be sufficient to ensure groundwater protection.

Response:

The groundwater monitoring system has been developed to meet all current standards for water quality protection. The LARWQCB will review and approve the proposed groundwater monitoring system prior to the start of construction. Furthermore, the LARWQCB can require that additional monitoring points be added to the groundwater monitoring system anytime it feels such actions are warranted.

The LARWQCB reviews and revises WDRs for all Class III sites (including the inactive City Landfill) to ensure consistency with revised CCR, Title 23, Chapter 15, which requires upgrading of groundwater monitoring systems to identify water quality degradation. Article 5 of Chapter 15, adopted in 1991, specifies new guidelines for the siting of groundwater monitoring wells around all active landfills. In addition, the U.S. Environmental Protection Agency (USEPA) issued 40 Code of Federal Regulations (CFR), Parts 257 and 258, "Subtitle D" (or Solid Waste Disposal Facility Criteria) in 1991, which contains additional groundwater monitoring requirements. The LARWQCB adopted Order No. 93-062 in September 1993, which requires all regional landfills to comply with these federal regulations.¹² In July 1997, the above regulations were incorporated into CCR, Title 27, Chapter 3, Subchapter 3, Article 1, SWRCB-Water Quality Monitoring and Response Programs for Solid Waste Management Units.

^{12/} *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, California Regional Water Quality Control Board, Los Angeles Region (4), p. 4-10. Adopted June 13, 1994.

The LARWQCB also administers the Solid Waste Assessment Test (SWAT) Program pursuant to the California Water Code (CWC) §13273, which requires owners of active or inactive nonhazardous landfills to evaluate possible migration of hazardous wastes or leachate from each facility. In addition to requiring site evaluations, the SWAT Program provides deadlines for implementation of water quality monitoring systems at active solid waste disposal sites, requires water quality monitoring systems at many closed solid waste landfill sites that previously had none, and requires identification of leaking sites for verification monitoring or remedial actions under CCR, Title 27, §20385. Upon approval of the monitoring program by the LARWQCB, landfill operators must collect groundwater monitoring data during four consecutive quarters and submit that data in a SWAT report. SWAT reports must include an analysis of both surface and groundwater on, under, and within a 1-mile radius of the landfill site.

Currently, 22 groundwater monitoring wells are installed at the project site to monitor groundwater conditions and water quality. Both shallow and deep groundwater monitoring wells have been installed. The shallow wells are screened exclusively within alluvial material and bedrock to properly evaluate and compare groundwater quality upgradient and downgradient in similar geologic formations. Upgradient wells were installed and designed to monitor natural groundwater conditions present within the water-bearing strata. These wells are intended to supplement monitoring of groundwater conditions around the perimeter of the existing landfill and to monitor for possible offsite pollution migration. Downgradient wells (i.e., deep monitoring wells) were installed to monitor potential impacts resulting from the existing inactive landfill. Of the 22 wells installed, 13 specifically monitor groundwater downgradient from the existing landfill. The County Landfill is hydrogeologically upgradient of the existing inactive landfill.

In addition to groundwater monitoring wells, the vadose zone is also monitored. This zone is defined as the area below the landfill and above groundwater where water may be present or suspended in the weathered bedrock or soil. The presence or absence of this water has historically been monitored at the City Landfill through the use of lysimeters, which are special monitoring points designed to permit the collection of water that may be in the pores of the soil or weathered bedrock above the groundwater zone. These wells are shown in the Draft SEIR, Figure 4.3-4.

Currently, vadose zone monitoring is accomplished by four lysimeters that have been installed in the vadose zone of the existing inactive City Landfill. Quarterly monitoring records (since lysimeter installation) have indicated that no liquid can generally be collected from the lysimeters. Monitoring of the vadose zone is also conducted using a series of gas sampling probes installed around the waste mass. These probes are monitored on a monthly basis for the presence of LFG as required by the SCAQMD. One groundwater sample is collected in one of the probes exhibiting the highest LFG concentration, as required by the SCAQMD. Monitoring at the County Landfill is accomplished by sampling the underdrain system outfall points instead of lysimeters. For both areas, sampling is performed quarterly and findings are reported to the LARWQCB. This would also occur for the City/County Landfill.

As indicated in Topical Issue 6, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to WDRs, liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-135 and 4-136, and the design and installation of the comprehensive monitoring system (described above), no significant impacts to the beneficial groundwater uses of the San Fernando Valley Groundwater Basin would occur. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 8: Landfill Liner Design

Concerns have been raised that the proposed design for the landfill liner system would not provide sufficient protection against the degradation of existing groundwater resources.

Response:

The landfill liner system will be constructed in compliance with USEPA Subtitle D regulations. The USEPA has found that a Subtitle D liner system protects groundwater resources from municipal solid waste under all environmental conditions in the United States.

As stated in City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, p. 4-135, in compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, §258.40 (Design Criteria), the proposed development of the City/County Landfill would include the installation of a composite liner system. This liner system would consist of two components: (1) the upper component shall consist of a minimum 30-mil-thick flexible membrane liner (FML), and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot-thick layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is used, it would be at least 60 mils thick. If a thinner soil barrier layer of lower permeability is used, it would have equal or superior containment capability. The FML component would be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill would have an LCRS, consisting of either a minimum 1-foot-thick granular layer or a geosynthetic alternative with an equivalent flow capacity, and a minimum 2-foot-thick protective soil cover over which refuse will be placed. There would also be a protective toe berm at the landfill terminus.

In accordance with RCRA Subtitle D, 40 CFR, Part 258, the composite liner system will be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system will be described in the project proponent's Joint Technical Document (JTD) for the landfill facility. The liner systems will be constructed and field tested in accordance with strict QA/QC procedures submitted to and approved by the LARWQCB prior to construction.

Areas of natural groundwater seepage will be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains will be placed in areas where seeps and springs have been identified and will collect and convey any water from these sources to the sedimentation basin. The nature and source of the seep will be investigated including sampling and laboratory testing.

With the proper installation of the proposed liner system, no significant impacts on groundwater resources are anticipated with development of the proposed project.

The SEIR concluded that no significant impacts to beneficial uses of groundwater of the San Fernando Groundwater Basin would occur as a result of the development of the proposed landfill. To address potential environmental impacts resulting from leachate formation, the proposed landfill is mandated by State and federal laws to install a leachate collection and removal system (LCRS). The LCRS will be installed on top of the liner system in all areas of the proposed landfill footprint including side slope and waste-on-waste areas of the existing inactive City Landfill. This system will be constructed, maintained and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS will be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. A description of the components of the leachate treatment system is provided in the Draft SEIR, Section 2.7.4, Leachate Collection and Removal System, p. 2-61

In addition to the LCRS, operational practices will be performed by the Applicant to minimize leachate generation. These include diverting stormwater runoff around the landfill, diverting surface water runoff away from active landfilling areas, minimizing the size of the landfill working face area, grading the landfill surface to provide positive surface water drainage away from active landfill areas, and applying daily, intermediate, and final cover material to minimize moisture infiltration into the waste mass. Additionally, the proposed City/County Landfill will not accept liquid wastes or wastes with high-moisture content.

It is anticipated that the design and operational characteristics of the proposed landfill, the installation of numerous environmental protection and control systems, and the continuous monitoring during landfilling operations and the closure and post-closure maintenance period will ensure the integrity of groundwater resources within Sunshine Canyon.

As discussed in Section 4.3.2 of the Draft SEIR with regard to potential offsite migration of leachate, consulting geologists have made a determination based on published literature, field hydrogeology tests, geologic mapping and water quality data, that landfilling within Sunshine Canyon would not create a significant impact on beneficial groundwaters of the San Fernando Valley Groundwater Basin.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to Waste Discharge Requirements (WDRs), liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

The proposed landfill would not impact any imported drinking water or domestically produced drinking water (e.g., from local area wells). In this regard, it should be noted that there would be no impacts on the nearest spreading ground (Hansen Spreading Ground), which is located approximately 5 miles southeast of the project site. In addition, surface water runoff from the project site is safely conveyed into the City's flood control system, which connects with the County's flood control system.

In addition to the engineering controls described above, the geologic setting of the landfill isolates it from drinking water aquifers. As discussed in the SEIR, the only hydraulic connection between the landfill site and drinking water supplies is the relatively narrow and shallow layers of alluvium along the stream channel in the axis of the canyon. This alluvium will be removed beneath the footprint of the landfill during

construction, as discussed in the SEIR. The natural geologic setting has contributed significantly to the fact that landfilling activity in the canyon over the past 30+ years has not impacted drinking water supplies. Additional information regarding leachate migration from the landfill can be found in Topical Issues 6 and 7. Additional information regarding the proposed liner system and its ability to withstand significant earthquakes can be found in Topical Issue 29.

Topical Issue 9: Leachate Generation, Collection, and Treatment

Concerns have been raised that the proposed City/County Landfill would result in substantial leachate generation, which could result in surface or groundwater contamination.

Response:

The leachate collection and removal system and Subtitle D composite liner provide ample protection for groundwater from leachate. The engineered surface water control facilities and landfill operational practices mitigate the potential for leachate impacts on surface water.

The potential for leachate to form when water passes through deposited waste could occur if excess water use or water spreading for irrigation or dust control or rainfall results at the proposed landfill. Leachate generation rates are primarily dependent on the amount of liquid the waste originally contained and the quantity of precipitation that enters the landfill through the cover and falls directly into the waste. The chemical characteristics of the leachate will be affected by the biological decomposition of biodegradable organic materials, chemical oxidation processes, and dissolving organic and inorganic materials in the waste. The leachate's chemical composition will change as the proposed landfill goes through the various phases of decomposition, similar to the changes that occur in LFG production.

In order to determine the amount of leachate that the proposed City/County Landfill would generate, an engineering model called Hydrologic Evaluation of Landfill Performance (HELP) was used. HELP is a hydrologic model of water movement across, into, through, and out of the landfill. The HELP model predicted leachate quantities based on observations of empirical data and was used as the basis for a conservative design of the LCRS. That design also predicts the maximum estimates of leachate production after closure of the proposed project.¹³ HELP facilitates the estimation of surface runoff, drainage, and leachate production that might develop as a result of landfilling operations using a wide variety of landfill designs. The model uses climatic soil and design data to simulate the effects of hydrologic processes, including precipitation, surface storage, runoff, infiltration, percolation, evapotranspiration, soil moisture storage, and lateral drainage. A landfill system includes various combinations of vegetation, cover soils, waste cells, special drainage layers, impermeable barrier soils, synthetic membrane covers, and liners that can be modeled with HELP.

Based on local average precipitation data, combined with the assumptions of an operating landfill designed with interim covers in place, the HELP model indicated that approximately 5.2 to 9.2 inches of precipitation may percolate through the landfill in 1 year. It is anticipated that after closure, and with an engineered final cover placed on the landfill, only minimal amounts of precipitation would percolate through the landfill in

^{13/} *Report of Disposal Site Information, Proposed Sunshine Canyon Landfill Extension Site, Volume I, PRA Group, p. 70. August 16, 1991.*

1 year.¹⁴ The steeper slopes of the City/County Landfill would be built with surface drainage systems that would not be subject to significant percolation due to the rapid rate of surface water runoff. As such, the major contributor of percolation is expected to be the top deck surface area of the landfill, which is relatively flat. Preliminary design of the project site indicated that infiltration would be lessened by reducing the area of percolation in the canyon.

With regard to the long-term contamination potential of a “typical” landfill permitted to accept municipal solid waste, an extensive review of published material conclusively demonstrated that landfill leachate possesses a trend of decreasing pollution loads over time.¹⁵ Observed studies show that key leachate indicators (e.g., total organic carbon, chemical oxygen demand, biological oxygen demand, and leachate concentration) substantially decrease in concentration relative to an initial value and eventually, upon landfill closure, stabilize both chemically and biodegradably.

For the proposed project, the HELP model projected the amount of leachate generation expected to occur. Additional modeling for the proposed City/County Landfill is anticipated to be performed during preparation of its ROWD. It was estimated by using the HELP model that the County Landfill had an estimated leachate production rate of 120 gallons per minute (gpm). No leachate has been detected in the groundwater monitoring wells at the County Landfill, and all extracted, treated alluvial groundwater has been approved for onsite irrigation and dust control use by the LARWQCB.

To address potential environmental impacts resulting from leachate formation, the proposed City/County Landfill is mandated by State and federal laws to install an LCRS. The LCRS will be installed on top of the liner system in all areas of the proposed landfill footprint including side slope and waste-on-waste areas of the existing inactive City Landfill. This system will be constructed, maintained, and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS will be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. The LCRS will also be designed and constructed pursuant to 40 CFR, Part 258, and in accordance with CCR, Title 27, §20340.

The LCRS will be of the blanket type and overlay the FML, and it will collect and direct the intercepted leachate toward leachate sumps where it will be collected and removed from beneath the waste. The blanket system will be sloped toward the sumps to prevent ponding of leachate. The proposed LCRS drainage network will be designed and engineered to withstand the potential effects of seismic events. The HDPE pipe selected for the proposed LCRS drainage network will have the ability to deform (be flexible) without leakage during potentially strong earthquakes.

In addition to design features described above, operational practices will be performed by the landfill operator to minimize leachate generation. These include diverting stormwater runoff around the landfill, diverting surface water runoff away from active landfilling areas, minimizing the size of the landfill working face area, compacting disposed waste to decrease its permeability and increase its ability to shed water, grading the landfill surface away from active landfill areas, and applying daily, intermediate, and final cover material to minimize moisture infiltration into the waste mass. Additionally, the proposed City/County

^{14/} Ibid., p. 72.

^{15/} M. Reinhard, Ph.D., Stanford University. Unpublished letter to Purcell, Rhoades & Associates, December 21, 1987.

Landfill will not accept liquid wastes or wastes with high-moisture content (i.e., wastes containing greater than 50 percent water by weight).

Leachate collected by the LCRS would be directed by gravity to sumps and then discharged to a leachate transmission pipeline for conveyance to a storage tank at the leachate treatment facility. The flow capacity of the pipeline would exceed anticipated leachate flow rates. The leachate volume and its characteristics would be monitored closely at the storage tank by periodic sampling and analysis.

A description of the components of the leachate treatment system is provided in the Draft SEIR, Section 2.7.4, Leachate Collection and Removal System, p. 2-61. This system includes air stripping and carbon-bed filtration treatment processes. Leachate treatment processes would be conducted in accordance with applicable permit conditions of the LARWQCB.

The leachate treatment system would be similar to the one currently in place at the operational County Landfill. Recovered leachate would be pumped to a condensate holding tank. From this tank, the leachate would be air stripped and carbon bed polished to remove chemical impurities. Air stripping removes the majority of VOCs from leachate by moving air through the collected liquid. Carbon is then added to “polish” the liquid and remove any remaining low-level VOCs. Treated liquids would then be stored in one of two treated handling tanks. Effluent from the leachate treatment facility would be sampled and tested for contaminants, and a bioassay test would be conducted. After completion of these tests, if it is acceptable, treated liquids would be used for irrigation or dust control. Approval for the reuse of treated liquids at the proposed City/County Landfill would be obtained from the LARWQCB.

The project site is also located in a relatively dry area (average annual rainfall is estimated at approximately 10 inches);¹⁶ a typical rainstorm has a short duration and high intensity. Rainfall would tend to run off the landfill surface and not infiltrate the surface area, minimizing the potential for leachate formation.

It is anticipated that the design and operational characteristics of the proposed landfill, the installation of numerous environmental protection and control systems, and the continuous monitoring during landfilling operations and the closure and postclosure maintenance period will ensure the integrity of groundwater resources within Sunshine Canyon. It is not expected that this resource would be impacted by the proposed project development.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-135 and 4-136, for leachate generation, no significant impacts would occur.

Topical Issue 10: Sensitive Biological Habitats

Statements have been made that the removal of Venturan coastal sage scrub at the site would result in unavoidable significant impacts on endangered and sensitive animal species.

¹⁶/ Based on County Department of Public Works Oat Mountain Hydrologic Map (1969), closest 50-year isohyet (maximum 24-hour amount) located within project site boundary.

Response:

The dominant natural plant community within the project site is Venturan coastal sage scrub. This community comprises 149.1 acres in the City and 10.9 acres in the County. Venturan coastal sage scrub occurs north, east, and south of the existing City Landfill on exposed slopes and is dominated by California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), thick-leaved yerba santa (*Eriodicyton crassifolium*), black sage (*Salvia mellifera*), and white sage (*Salvia apiana*). Other plant species occurring in this community include Mexican elderberry (*Sambucus mexicana*), sudweed aster (*Lessingia filaginifolia*), pinebush (*Ericameria pinifolia*), and Our Lord's candle (*Yucca whipplei*).

This habitat is one of four sensitive habitats found within the project site. Venturan coastal sage scrub is ranked "highly threatened" by the California Natural Diversity Data Base (CNDDB) because of development pressures. The CNDDB ranks this community as S2.1, which means this community has between 21 to 100 viable occurrences or covers between 4,000 to 20,000 hectares (i.e., 9,884 to 49,420 acres) in California. In addition, high numbers of rare species are found within this community.

The development of the proposed City/County Landfill within the City portion of Sunshine Canyon would result in the direct loss of approximately 82.2 acres of Venturan coastal sage scrub habitat and resulting loss of small mammals, reptiles, amphibians, and other small animals of slow mobility. This impact is considered significant. More mobile wildlife species would be forced to move into remaining areas of open space or other habitats.

The California Department of Fish and Game (CDFG) has identified a list of Species of Special Concern (SSC). Several SSCs were located during field surveys or have the potential to occur onsite; refer to the Draft SEIR, Table 4.4-4, p. 4-159, for a status of sensitive wildlife species.

Suitable habitat exists within the Venturan coastal sage scrub habitat for the California gnatcatcher (*Poliophtila californica californica*) that is federally listed as threatened and is an SSC. The California gnatcatcher has restricted habitat requirements, consisting of coastal sage scrub dominated by coastal sagebrush, and generally occurring below 750 feet in elevation in coastal regions and below 1,500 feet in elevation in inland locations (Atwood and Boisinger, 1992). Although the species was not observed during numerous field surveys conducted onsite, the project site is located within this species' historic geographical range; consequently, the species could possibly move onsite prior to project implementation. Mitigation measures are proposed to reduce impacts on the California gnatcatcher to a less than significant level. Surveys for the California gnatcatcher will be conducted prior to obtaining grading permits to determine the status of the species within the proposed development areas. If grading activities occur during the nesting season, a federally permitted biologist will survey areas to determine whether the species is present. If gnatcatchers are present, grading activities will cease until proper officials are notified, and additional habitat restoration or purchase of suitable offsite habitat will be required.

The existing Venturan coastal sage scrub provides suitable habitat for reptiles. The San Diego horned lizard (*Phrynosoma coronatum blainvillei*) is located within this habitat and is considered threatened. Impacts on this species are considered significant. Restoration of the coastal sage scrub habitat is proposed to mitigate impacts to a level of less than significant. Although removal of habitat will create a temporal loss of the species, it is anticipated that populations should recover following restoration. Topsoil that are is friable will be selected to suit lizard habitat requirements. In addition, the coastal western whiptail (*Cnemidophorus tigris multiscutatus*) was also observed onsite. Because this species is fairly common regionally, impacts on

this species are considered adverse but not significant. (Although not considered sensitive by State or federal resource agencies, it is considered locally rare in southwestern California and was recently included as a Candidate 2 species for federal listing.) Suitable habitat is also present for the silvery legless lizard (*Aneilla pulchra pulchra*), considered an SSC, and the coastal rosy boa (*Lichanura trivirgata roseofusca*). Because suitable habitats are available in the vicinity of the project site, impacts on these species are considered adverse but not significant.

The removal of Venturan coastal sage scrub would also affect the following SSC bird species that were observed onsite and could potentially breed onsite: Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) and loggerhead shrike (*Lanius ludovicianus*). Because suitable habitat exists for these species in the vicinity of the project site, impacts on these species are considered adverse but not significant. The Bell's sage sparrow (*Amphispiza belli belli*) and coastal cactus wren (*Campylorhynchus brunneicapillus*) were not present onsite during breeding bird surveys conducted in 1995. Although suitable habitat is present, the potential for these species to occur onsite is low. Potential impacts on these species as a result of project implementation are considered less than significant.

Coastal sage scrub habitat also provides winter foraging habitat for the northern harrier (*Circus cyaneus*) (SSC), which was observed on the adjacent site. The prairie falcon (*Falco mexicanus*) (SSC) was also observed onsite. The golden eagle (*Aquila chrysaetos*) is a California Fully Protected Species, an SSC, and protected by the federal Bald Eagle Act. A golden eagle was observed onsite during previous field surveys. Because of the large amount of foraging habitat available for this raptor species in the vicinity of the site, impacts on raptor foraging habitat are not significant. If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey will be conducted for active nesting areas. If active nests are found, no construction activities will occur within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each nest will be fenced. Trees containing nests will only be removed during the nonbreeding season.

Proposed project mitigation includes the restoration of Venturan coastal sage scrub onsite, and this will include a detailed conceptual mitigation plan containing information on planting, maintaining, and monitoring revegetated coastal sage scrub habitat. The implementation of this plan will provide greater than a 1:1 (replacement: removal) ratio to offset loss of habitat. Surface soils and seed sources of Venturan coastal sage scrub will be gathered from areas of the project site and spread within onsite mitigation areas.

After the incorporation of the City Mitigation Measures identified in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, pp. 4-179 through 4-181, no significant impacts on endangered and sensitive animal species due to the removal of Venturan coastal sage scrub would occur.

Topical Issue 11: Oak Trees and Douglas Fir Trees

Questions have been raised regarding why the project proponent would perform offsite rather than onsite big-cone Douglas fir and oak tree mitigation for those resources that would be disturbed within Sunshine Canyon.

Response:

Both onsite and offsite planting areas are being proposed for big-cone Douglas fir and oak tree mitigation by the project proponent. The proposed project (including closure activities) would result in the direct loss

of 545 coast live oak trees (*Quercus agrifolia*), 19 canyon live oak trees (*Quercus chrysolepis*), and 2.7 acres of small isolated patches of big-cone Douglas fir (*Pseudotsuga macrocarpa*) found within the proposed landfill footprint.

Direct project impacts on these resources will be mitigated to the greatest extent possible by implementing replanting programs and performing phased restoration on the landfill site. Mitigation tree planting will primarily occur within O'Melveny Park and the ±100 acre open-space area located south of the existing landfill. The open-space area is to be maintained as open space as part of the original City approval of the inactive City Landfill. Walnut and oak trees will be planted in suitable barren portions of the open-space area between the existing City Landfill and Granada Hills, O'Melveny Park, in East Canyon, and on the canyon ridge areas above the clearing limits. Sycamores and willows will be planted along Bee Canyon and East Canyon Creek. Appropriate planting locations will be selected based on soil types, steepness of the slope, and aspect (i.e., location and or direction of the sun). Mitigation measures will comply with the City's Oak Tree Ordinance.

City Mitigation Measures for the loss of oak tree resources will comply with the Los Angeles City Oak Tree Ordinance and include replanting native trees at a 2:1 (replacement:removal) ratio, consisting of 15-gallon or a 5:1 ratio of 3-gallon container trees. Mitigation trees will be planted prior to removal of impacted trees, and all mitigation trees will need to be specimen size within 1 year after tree removal. A specimen tree is defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above the ground. A total of one hundred 24-inch box and twenty-five 36-inch box size coast live oak trees shall be planted in areas identified by the City. The trees planted will be required to be in natural form. The total mitigation tree count obtained using the 5:1 replacement ratio will be reduced by 125 trees to account for the inclusion of these larger trees. To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program will be implemented. Each year, the mitigation planting will be monitored for growth and survival.

Native tree seed stock will be obtained from the onsite plant materials center (i.e., nursery). The center will include a greenhouse and shade house that will be used for the germination of native tree seed stock (e.g., coast live oak, canyon live oak, big-cone Douglas fir, sycamore, maple, and black walnut) and native vegetation gathered in and around the Sunshine Canyon area. Once germinated, these species will be used as part of the revegetation programs within Sunshine Canyon.

The existing nursery (located in the City) is recognized as one of the largest growers of coast live oak trees in the Southern California region. The project proponent, in conjunction with its consulting forester, has advanced the growing techniques for both the coast live oak and the big-cone Douglas fir tree species. A cooperative research program is established at this nursery with Oregon State University, Department of Forest Sciences. Future onsite revegetation programs that are being proposed will be established in cooperation with the City's Chief Forester (Street Tree Division). The current tree planting and mitigation program at the existing City Landfill is achieving a near 90-percent average success rate, and trees planted in the open-space area are increasing in height by 6 inches or more per month.

After the incorporation of City Mitigation Measures for Douglas firs and oak trees identified in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, pp. 4-197 and 4-198, no significant impacts on these resources would occur.

Topical Issue 12: Wetlands

Questions have been raised regarding why the project proponent would perform offsite rather than onsite wetlands mitigation for impacts on resources that would be disturbed within Sunshine Canyon.

Response

Onsite mitigation for the loss of wetlands is not practical due to unsuitable conditions for establishing both wetlands and riparian habitats. As a result of this determination, the project proponent will provide mitigation that will result in no net loss of wetland habitat.

Development of the City/County Landfill would remove both wetland and riparian habitats from the project site. It is expected that the streamzones and wetland areas located within the proposed landfill footprint and some areas external to those areas (i.e., used for ancillary facilities) would be graded, filled, or disturbed as a result of landfill development. Grading of the site would occur in phases as dictated by the need for additional landfill footprint area. Because the landfill would remain indefinitely (as a constructed fill area), wetland habitats would not be reestablished within these areas.

Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies to compensate for impacts on riparian and wetland resources. These sites include Bull Creek, Bee Canyon, and East Canyon, which are located either adjacent to or in proximity to the project site. If neither of these potential candidate sites are available, the project proponent will purchase wetland credit through an established mitigation bank (one that is already established by a developer, public, nonprofit, or private entity) in consultation with regulatory agencies as compensatory mitigation for impacts on wetland and riparian resources.

After the incorporation of City Mitigation Measures for wetlands identified within the Draft SEIR, Section 4.4.2, Wetlands and Riparian Habitat, pp. 4-189 through 4-191, no significant impacts on this resource would occur.

Topical Issue 13: Closure of Existing Inactive City Landfill

Questions have been raised regarding the required closure of the existing inactive City Landfill and revegetation activities.

Response

Closure of the inactive Sunshine Canyon City landfill is taking place as soon as possible. BFI is currently waiting for regulatory approval of the final Closure Plan. Once the final Closure Plan is approved, BFI will commence final design and closure construction and revegetation activities. Pursuant to CCR, Title 27, §21090, as part of landfill closure, final cover is required to be placed on a landfill's top deck, side slopes, and bench areas.

The proposed final cover for closure of the existing inactive City Landfill, consists of a monolithic soil final cover layer relying on evapotranspiration and unsaturated permeability to control water infiltration. The monolithic final cover would be revegetated to provide evapotranspiration and long-term erosion control caused by potential surface water runoff. When revegetated, a permanent grass and legume cover will

provide an effective means to control fugitive dust emissions. Selected plant species would be chosen for rapid establishment. Due to the existing terrain, the seed mix chosen would be comprised of shallow-rooted (less than 12 inches) drought- and pH-tolerant plants. Native and nonnative seed mix would be applied. It is anticipated that the vegetation cover soil would eventually evolve into a mosaic of shrubs interspersed with annual grasslands. Once established, selected plant species are intended to be self-propagating and not require excessive irrigation or long-term maintenance.

To ensure successful revegetation, a 3-year revegetation monitoring and maintenance program would be implemented. Periodically, revegetated areas would be monitored for growth and survival rates. A maintenance and monitoring program would be implemented during the 30-year postclosure maintenance period.

A ± 100 acre open-space area is located southeast of the existing inactive landfill within the City jurisdiction. This area is maintained as open space and will be enhanced by the project proponent with additional natural vegetation to promote wildlife in this area. Appropriate planting locations will be selected within this area based on soils, slope steepness, and aspect. The external abutting slopes and peaks of the inactive landfill site will remain undisturbed. The upper portions of the ridgeline (i.e., 50 vertical feet below the ridgeline) will also be left undisturbed. The upper perimeter ridges of the inactive City Landfill will be planted with native trees (following the approval of the final closure and postclosure maintenance plan [FCPMP] by the City LEA) in order to minimize visibility of the inactive landfill and proposed City/County Landfill. The permanent revegetation of the inactive City Landfill cannot feasibly be undertaken until all responsible government agencies, including the City LEA, have approved the FCPMP. An application for closure was filed prior to ceasing operations in September, 1991, but City litigation challenging the County's approval of landfilling within the County portion of Sunshine Canyon effectively halted the City's processing of that plan for nearly four years. Since the settlement of that case, the City has been processing the plan.

For the proposed project, the Applicant proposes that the City/County Landfill would be planted with a variety of trees, shrubs, and grasslands to provide wildlife habitats. As operating landfill areas are completed, it is proposed that the finished slope will be covered with both amended soil and recycled green waste material. These materials will be placed on the front surfaces of slopes after they have received an impermeable seal. As soils are added, amendments would be included to balance any unsuitable characteristics such as acidity (pH). Fertilizers would be added at the time of soil placement and continued as part of the project proponent's ongoing maintenance program. This soil cover will provide rooting material for the final vegetation. The project proponent also proposes that revegetation would take place concurrently with filling operations as the landfill progresses up the canyon; only the active filling areas and other operational areas of landfill would not be vegetated. The remainder of the inactive disturbed areas onsite would be planted with either temporary vegetation (on areas that remain inactive for a period longer than 180 days) or permanent vegetation.

Revegetation of slopes and fill areas with appropriate native flora will be accomplished to support local fauna. As part of the proposed revegetation plan, the reestablishment of vegetation will focus on using native species from local seed sources. Nonnative species may be used only if it is approved by the consulting biologists for areas where quick cover or a nurse crop is needed and would be removed later if appropriate. Replacement cover material will be obtained from within Sunshine Canyon to retain soil composition compatible with native flora and leave the surrounding topography undisturbed.

Topical Issue 14: Noise

Concerns have been raised that the proposed City/County Landfill operations would create significant noise impacts on sensitive receptors within the area.

Response

During construction, the nearest residential unit (located 1,700 feet southwest of the nearest point of the construction area onsite) would be exposed to a noise level of 54 decibels on an A-weighted scale (dBA) when construction is at the closest point. Because the existing ambient noise level near the closest receptor is 52.4 dBA, a construction noise increase to 54 dBA at that location would not be a perceptible audible increase and therefore is not significant. In 1995, noise readings were taken at five different locations in proximity to the landfill to determine existing ambient noise levels. The proposed City/County Landfill would not significantly impact existing ambient noise levels at any of the selected noise reading locations.

The noise generated from landfilling operations is expected to be similar to the noise produced during construction activities because construction and landfilling activities would use the same types of equipment. The noise emanating from the inactive City Landfill (associated with routine maintenance) is not audible to the residential developments located south of the project site unless the maintenance equipment is operating near the top deck area of this landfill. All operational activity related to the proposed project would take place within the boundaries of the project site and well below existing perimeter ridgelines. Therefore, any sound emanating from landfilling operations would be effectively blocked by the existing landfill, intervening terrain, and the existing landscaped berm near the ±100 acre open-space area. Any landfill operation noise that may be audible at the trailers located across from the landfill entrance would be attenuated by the extended distance and masked by existing noise from the I-5 Freeway, railroad, and wood-chopping business. Therefore, any potential new noise sources associated with landfill operations would be from increased truck traffic proximal to the trailers.

It is not reasonably foreseeable that blasting would be used as part of the proposed landfill, although methods of excavating earthen materials can vary with encountered field conditions. As stated in the Draft SEIR, Section 2.6.3, City/County Landfill Design, p. 2-50, various excavation methods would be used to achieve foundation base-grade elevations. The specific methods would be a function of the soil type encountered or bedrock material expected to be excavated. Conventional construction equipment, such as an excavator, wheeled loaders, dozers, and scrapers, would be utilized. The project site would be excavated within the limit lines and base of excavation contours of the proposed landfill footprint to obtain materials for a proper foundation for the landfill liner. However, if blasting is used due to the unforeseen conditions of extremely hard rock, appropriate permits will be obtained from City departments and charge densities would be selected so that resulting noise levels from blasting would not exceed 70dB.

Any additional increases in traffic-generated noise would be largely masked by traffic traveling on the I-5 Freeway. Ambient noise increase due to the proposed project near the trailers located across San Fernando Road is only projected to increase by about 1 dBA. When additional ambient noises are considered (e.g., the railroad and existing firewood chopping operation), the community noise equivalent level (CNEL) increase would be further reduced. Based on the presented significance criteria (i.e., City Noise Ordinance), a noise impact is considered significant when it exceeds a 3-dBA CNEL increase; therefore, project-generated traffic would not result in a significant noise increase at this location.

With the incorporation of City Mitigation Measures for noise identified in the Draft SEIR, Section 4.5.2, Operational Noise Impacts, p. 4-220, no significant impacts would occur.

Topical Issue 15: Land Use

Comments have been made that the proposed City/County Landfill would not be consistent with the Granada Hills-Knollwood Community Plan.

Response

Development of the proposed City/County Landfill would require an amendment to the *Granada Hills-Knollwood Community Plan* from Open Space to Heavy Industrial and a zone change from A1-1-O to M3-1-O. The ±100 acre open-space area would remain under its current land use and zoning designation of Open Space and A1-1-O, respectively. A portion of the proposed City/County Landfill, comprising ±42 acres, is already authorized in the County portion of Sunshine Canyon under existing County General Plan and zoning designations. The majority of acreage within the City portion of Sunshine Canyon is substantially disturbed from previous landfilling operations that occurred from 1958 to 1991.

Development of the proposed City/County Landfill would have minimal impacts on adjacent land uses. The operational County Landfill is located northwest of the proposed landfill footprint area. Other surrounding uses include open space to the north and west, gas storage fields to the west, an oil field to the southwest, and several freeways to the north and east of the project site. The nearest residential dwelling in Granada Hills is located approximately 1,700 feet from the proposed landfill footprint area. An existing ridgeline and a ±100 acre open-space area separate these uses. The existing perimeter ridgeline separates O'Melveny Park to the southwest, effectively blocking views from ground-level, park-related uses. Trailers and industrial uses located across San Fernando Road to the east are 700 feet from the proposed landfill footprint area. These uses would not have views of proposed landfill operations.

In addition, landfill operations would be regularly monitored by City, State, regional, and federal agencies for compliance with conditions of approval. There is a caretaker onsite 24 hours a day, and the telephone numbers of the District Manager of the landfill and SCAQMD are posted to immediately resolve any concerns due to landfill operations.

Following the direction of City staff, the project proponent is pursuing a General Plan Amendment/Zone Change (GPA/ZC) to accommodate the operation of a landfill facility (except in the ±100 acre open-space area as discussed above). Maintaining the current Open Space designation the project site would be inconsistent with future heavy-construction activities that must occur as part of State-mandated closure and postclosure maintenance (and the implementation of the FCPMP) of the existing inactive City Landfill. In addition, maintaining the *Granada Hills-Knollwood Community Plan* Open Space designation for the site would not be compatible with the adjoining operational County Landfill. Implementation of a GPA/ZC would also remedy these existing inconsistencies.

Several of the *Granada Hills-Knollwood Community Plan* objectives would be achieved through designating a facility to provide disposal capacity to meet the needs of the City's population and by preserving the ridgelines that surround the landfill (e.g., objectives 1, 2, 7, 8, and 10). The *Citywide General Plan Framework* recognizes the City's limited landfill capacity and calls for the development of more facilities to handle this need. The proposed landfill would help satisfy this need and meet the Element's infrastructure

and public services goals by providing adequate disposal capacity for the necessary disposal of mixed solid waste that cannot be reduced, recycled or composted, ensuring an environmentally sound and cost-effective solid waste management system, creating job opportunities, and preserving the existing perimeter ridgelines (e.g., goals 3A, 3F, 6A, 9F, 9G, and 9H). In addition, development of the proposed City/County Landfill would conform to the landfill siting criteria stated in the *City-Collected Refuse Disposal Plan* and solid waste provisions of the *Open Space Plan*.

The proposed landfill would also implement the solid waste management goals and policies of the City and County of Los Angeles by providing needed solid waste disposal capacity within the County. These solid waste management plans include *Solid Waste Management Status and Disposal Options in Los Angeles County*, *Los Angeles County Solid Waste Management Action Plan*, *City of Los Angeles Solid Waste Management Action Plan*, *City of Los Angeles Solid Waste Management Policy Plan*, *City of Los Angeles Source Reduction and Recycling Element*, *Integrated Solid Waste Management System for Los Angeles County*, *Los Angeles County Source Reduction and Recycling Element*, *Los Angeles County Countywide Integrated Waste Management Plan*, and *Los Angeles County Countywide Siting Element*.

In particular, the proposed landfill would satisfy objectives of the City's October 1993 *Phase IV Report, Solid Waste Management Policy Plan*. In Chapter 6 of that Plan, Objective 3.3 regarding Disposal Facilities calls for the City to:

... identify, evaluate, and secure by the year 2000 adequate disposal capacity to accommodate projected waste requiring disposal to the year 2020 with an optional reserve capacity in the year 2020 for 20 years of additional disposal.

To achieve this objective, the Plan presents three policies to secure adequate disposal capacity: a policy of Local Disposal, Remote Disposal, and Other Disposal Methods. The Remote Disposal policy calls for the transportation of City waste, either by rail or truck, to remote locations in Riverside, San Bernadino and Imperial counties, provided such disposal is environmentally safe, technically feasible, and publicly acceptable. The policy for pursuing Other Disposal Methods states that although several have been evaluated, none appear feasible due to implementation, environmental or financial issues. The remaining policy for achieving the Plan's objective, the policy for Local Disposal, calls for the City to work closely with the County, other jurisdictions and private firms to identify and secure additional disposal capacity in and/or outside the county to meet the City's needs. This policy recognizes that even with successful implementation of the City's Maximum Waste diversion goals and programs through source reduction, recycling, and composting programs, the City will have inadequate disposal capacity within its borders to dispose of all waste generated in the City. By the year 2000, no public or private landfills will be operating within the City (with the possible exception of the Bradley Landfill for two-three years); and by 2006, four of the remaining Class III landfills in the Los Angeles region are expected to close or reach capacity. Recognizing that the siting of landfills is extremely difficult, the policy also provides that the City will look to the expansion of existing landfills, in addition to working with the County to jointly develop landfill capacity:

- **Expansion of Existing Landfills.** Four landfills in the Los Angeles area that accept City-generated waste have the potential for expansion: Lopez Canyon, Bradley West, Chiquita Canyon and Sunshine Canyon. . . . The City will continue to monitor the expansion efforts of these landfills

quarterly and reevaluate their potential use for disposal of City-generated waste. (*Phase IV Report, Solid Waste Management Policy Plan pages 6-6 - 6-7*)

However, the current status of the three landfills mentioned in this policy other than Sunshine Canyon as having the potential for expansion leaves few options for achieving the City's goal. The County's June 1997 *Countywide Siting Element* (CSE) reveals the following status:

Lopez Canyon. This City-owned landfill, located in Lake View Terrace, had accepted up to 4,000 tpd of solid waste, but ceased operation in June 1996.

Bradley West. This landfill, located in the Tujunga area, was granted a variance by the City in July 1996 to increase its daily permitted waste intake from 7,000 to 10,000 tpd. During 1995, this facility had an average disposal intake of 4,604 tpd. The landfill is currently accepting approximately 7,000 tpd of waste, and it is projected to reach full capacity in the year 2000. (*CSE page 3-18*)

Chiquita Canyon. This landfill is located in the northwestern Santa Clarita Valley in an unincorporated portion of Los Angeles County. On February 25, 1997, the landfill's CUP was modified to allow for a landfill expansion to occur on 229 acres and provide a total of 23 million tons of disposal capacity. The operator is limited to a maximum daily disposal intake of 5,000 tons per day, six days per week, and the facility has a life expectancy of about 12 years based on this maximum rate. (*CSE page 7-18*)

Topical Issue 16: Hazardous Materials

Comments have been raised that the proposed City/County Landfill would have the potential to accept hazardous waste materials, thereby resulting in risk-of-upset conditions.

Response

The proposed project will be operated as a Class III nonhazardous municipal solid waste landfill facility. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility. The project proponent will implement a hazardous waste load-checking program at the project site similar to the program that currently exists at the operational County Landfill. This program will include employees visually inspecting incoming waste-hauling loads at the scale house area and using remote television monitors to inspect incoming rolloff-type loads and open-top vehicles. Radiation-detecting devices and sensors capable of detecting VOCs will also be used at the scale house area to prevent the unauthorized disposal of hazardous waste materials.

Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill. Solid waste would be unloaded in a segregated (isolated) area of the landfill site for visual inspection. For each load inspected, the following information will be recorded by the landfill employees: (1) date and time of load check, (2) name and telephone number of hauling firm, (3) license plate number of vehicle, (4) driver's name and license number, (5) source and type of waste, and (6) the type and amounts of any hazardous wastes found. Workers trained

to identify hazardous waste materials will inspect the unloaded wastes to see if they contain any hazardous wastes.

During random load checks, unacceptable wastes that are safe to handle will be picked out of the waste stream and placed in a sealed holding bin that is currently located adjacent to the landfill access road south of the scale facilities. Material from this bin will be removed by a contracted hazardous waste hauler and replaced with an empty, sealed bin. If a hazardous waste that may pose a serious risk to facility workers or the public or if unidentifiable material (that may be hazardous) is discovered during random load checking by one of the spotters at the active working face, the area will be immediately cordoned off. The spotter will immediately notify a landfill supervisor via the use of a two-way radio, telephone, pager, or visual/verbal contact. A landfill supervisor will have the vehicle driver detained and inform the LEA inspector assigned to the landfill. In addition, the supervisor will call the California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC), to correctly identify the material and, if necessary, take preventive steps to guarantee the highest level of safety.

If the duty officer at the DTSC states that the material is safe to handle, the refuse will be removed and temporarily stored onsite. The project operator will obtain an identification number from Cal-EPA. All containers used for storage of hazardous waste material will be clearly marked to indicate the date of waste accumulation. A label will be placed on all nonstationary containers in which hazardous wastes are stored.

If the material has the potential to pose a serious threat to facility workers, waste haulers, or the public (e.g., radioactive or acutely hazardous material), the immediate project area will be evacuated, and a contracted hazardous waste hauler will be called to remove the material from the project site and transport it to a permitted Class I hazardous waste landfill. The landfill supervisor will then inform the City of Los Angeles Police Department (LAPD) and the County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, so that proper criminal action can be taken. In addition, the City of Los Angeles Fire Department (LAFD), City of Los Angeles Department of Environmental Affairs, and the LARWQCB will be informed of the incident and all necessary reports completed.

The County Landfill operation currently has signs at the landfill entrance informing waste haulers that the facility is designated as a Class III nonhazardous municipal solid waste landfill site. Signs inform waste haulers of the rules and regulations governing the disposal of hazardous waste.

It is expected that small amounts of household hazardous waste (HHW) would remain undetected and be disposed of at the proposed landfill. These wastes are generally inadvertently mixed in with residential solid wastes by residential customers. However, it should be noted that approximately 46 percent of all refuse entering the project site would be delivered via transfer trucks. These transfer trucks would haul residual (i.e., nonrecyclable) waste materials from transfer stations/material recovery facilities (MRFs). All transfer stations/MRFs have existing load-checking programs in place. At these facilities, HHW, if found, is manually sorted and picked out of the waste stream and disposed of properly. In some cases, this material can be recycled.

For those HHWs that are landfilled, environmental control systems (e.g., landfill liner, LCRS, and leachate treatment) will reduce this potential risk-of-upset conditions to a less than significant level. It is expected that any trace contaminants in the LCRS will be collected and removed through that system.

With the incorporation of City Mitigation Measures for hazardous materials identified in the Draft SEIR, Section 4.9.1, Hazardous Materials, pp. 4-296 and 4-297, no significant impacts would occur.

Topical Issue 17: Vector Prevention and Control

Comments have been raised that the proposed City/County Landfill would attract vectors and spread disease and litter offsite.

Response

The proposed City/County Landfill has the potential to attract several different types of vectors to the project site. Certain types of vectors, such as rodents and insects, can be transported to the site via collection vehicles or self-haul trucks. Generally, the materials in curbside collection vehicles are continuously compacted prior to disposal at any facility, thus reducing live rodents. The residual solid waste materials from transfer stations/MRFs are also densely compacted into transfer trucks. These trucks are either enclosed or tarped prior to transport. General compaction densities would inhibit vector migration and destroy some existing vectors.

Effective operational procedures and quality assurance will be provided by the project proponent to ensure that the proper coverage of landfilled waste materials will be performed on a daily basis, similar to the existing County Landfill vector control practices. All waste materials brought to the site will be unloaded at an active working face area, compacted, tarped, or covered with at least 9 inches of clean soil by the end of the working day. Refuse will be compacted within 1 hour of placement to approximately 1,400 pounds per cubic yard (cu. yd.). At this refuse density, potential food source or habitation for vectors will be significantly reduced.

Many items that would be stored and used at the landfill facilities (e.g., administrative and employee ancillary buildings) have the potential to attract vectors (e.g., food, seed, office supplies). These items will be stored in closed containers and within an enclosed structure. Containers will be inspected routinely and cleaned regularly to reduce vector attraction. In addition, insect breeding will be minimized by preventing the ponding of surface water at the project site.

By following such procedures, the project proponent will ensure that potential food sources for common scavenging birds, such as pigeons, crows, and sea gulls, will not result in potential impacts, such as food and other wastes being carried to nearby properties, as well as deposited feathers and excrement that could potentially support ticks, mites, lice, and fleas.

Additionally, flies will not create nuisances at the proposed green waste and wood waste recycling area. The Los Angeles County Sanitation Districts conducted a fly vector investigation using shredded green waste as daily cover during a short-term evaluation at the Scholl Canyon Landfill. This study was designed to evaluate whether green waste attracts or deters flies. Results of the study indicated that shredded green waste does not attract flies. With respect to the proposed project, all source-separated green and wood wastes proposed for acceptance at the project site will be processed within 24 hours by landfill personnel. This waste type (if approved) will be used as alternative daily cover material at the landfill working faces or tarped at the end of the day and subsequently used as soil amendment material for landfill revegetation, erosion prevention, and weed abatement programs.

All buildings, paved surfaces, landscaped areas, and perimeter areas will be inspected regularly for signs of vector activity. Any structural defects will be repaired following discovery or during routine maintenance inspections. This will help prevent the intrusion of any ground-dwelling rodents. Additionally, both landfill operations and onsite ancillary facilities will be inspected routinely by the LEA.

With the incorporation of City Mitigation Measures for vectors identified in the Draft SEIR, Section 4.9.2, Vectors, pp. 4-300 and 4-301, no significant impacts would occur.

Topical Issue 18: Litter Control

Comments have been made that the proposed City/County Landfill would result in substantial litter generation beyond the project site boundary and within the adjacent community.

Response

Solid waste landfills have the potential to generate high volumes of litter. Litter generation can result in potential nuisance or aesthetic impacts. Sources of litter associated with operation of a landfill facility include waste materials blown from or dropped by refuse hauling vehicles, litter blown from the active working face by the wind or by the movement of landfill equipment, and unauthorized or illegal dumping. Generally, illegal dumping occurs throughout the City and County and primarily in rural or open space areas. In the past, illegal dumping has occurred in proximity to the project site along Foothill Boulevard, within the community of Sylmar.

Because the project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions could potentially transport litter offsite. The strongest winds generated within this area are during short-term episodes of Santa Ana wind conditions. During high wind conditions, the project site manager will designate confined and shielded portions of the landfill for disposal.

Currently, for the operational County Landfill, the project proponent uses an extensive litter control program with specific preventive and response measures to control windblown litter and debris onsite and, if necessary, within the vicinity of the landfill site. These measures include placing waste materials within confined working face areas, using proper compaction techniques and daily cover material, using portable litter fences adjacent to the daily operating area, and installing a 25-foot-high secondary litter fence along the southern boundary of the landfill's perimeter. In addition, the project proponent provides cleanup along San Fernando Road and its frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard, and within O'Melveny Park.

Once a week, or more frequently if required, the project proponent mobilizes cleanup crews to provide litter control pickup in areas surrounding the landfill site. These areas include O'Melveny Park, areas along Balboa Boulevard and San Fernando Road, and other areas in proximity to the landfill. In addition, and on a daily basis, landfill employees inspect the areas immediately adjacent to the landfill site to pick up litter, if necessary. Enforcement of litter control practices at the operational County Landfill is under the authority of the County of Los Angeles, Department of Health Services (County LEA).

Vehicles transporting waste loads to the project site that are not covered, as required by law, are also a contributor of onsite litter at the project site and within the general vicinity of the project area. Currently, haulers with uncovered waste loads are informed at the scale house area that all future waste loads must be

tarped and covered. If a specific refuse hauler continues to bring solid waste to the project site in vehicles that are not fully covered, the project proponent has the option to refuse delivery of the load and will impose fines and/or surcharges upon the violating waste-hauling company.

Drivers of waste-hauling vehicles who violate the mandated tarping requirement are given a notice by the project proponent that states the following requirement:

TARPING VEHICLE CODE REQUIREMENT: The following tarping vehicle code will be enforced at the Sunshine Canyon Landfill. First offenders will be warned a second time, and multiple offenders will be fined \$100.00 per offense.

Additionally, in accordance with the California Vehicle Code (CVC), §23114(a), no vehicle shall be driven or moved on any highway unless the vehicle is constructed, covered, or loaded to prevent any of its contents from dropping, shifting, leaking, blowing, spilling, or otherwise escaping from the vehicle. In addition, CVC, §23115 states that no vehicle loaded with garbage, swill, cans, bottles, wastepapers, ashes, refuse, trash, or rubbish; or any noisome, nauseous, or offensive matter; or anything transported to a dump site for disposal shall be driven or moved upon any highway unless the load is totally covered in a manner that will prevent any part of the load from spilling from the vehicle.

Large-volume customers currently comply with these requirements at the operating County Landfill. If these large-volume customers do not comply, there is a mechanism (via their existing contract) to enforce a fine(s). Also, the project proponent is presently working with the County LEA to encourage small-volume haulers to use proper tarping.

The proposed City/County Landfill will incorporate litter control measures similar to those described above for the operational County Landfill. Since the County Landfill became operational in August 1996, mitigation measures have effectively prevented fugitive litter migration off of the property. The potential for litter migration into O'Melveny Park or residential areas within Granada Hills is very unlikely, due to existing topographic features and the separation distance from the working face areas to these areas. However, should fugitive litter reach these areas, the landfill's litter control crew will be dispatched immediately to clean up any migrating litter from the landfill project.

With the incorporation of City Mitigation Measures for litter identified in the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306, no significant impacts would occur.

Topical Issue 19: Traffic Conditions at Landfill Entrance

Comments have been made that the proposed City/County Landfill would result in unacceptable level of service (LOS) conditions on San Fernando Road during the morning and evening peak hours. In addition, it has been suggested that the proposed project would result in unsafe turning movements on San Fernando Road at the landfill entrance.

Response:

The improvements recommended at the landfill entrance on San Fernando Road, listed in the Draft SEIR, Table 4.13-9, p. 4-372, will mitigate the impacts of the proposed project traffic at this location to a less than

significant level. The San Fernando Road/Project Driveway intersection is expected to operate at LOS C during both the a.m. and p.m. peak hours with the implementation of the recommended mitigation measures.

In addition, intersection improvements have been made to the landfill entrance (adjacent to San Fernando Road) as a result of developing the County Landfill. These improvements were required pursuant to the adopted CUP for the County Landfill. Improvements were also authorized under a "B" permit granted by the City BOE. In this regard, a signal at San Fernando Road and the landfill entrance was installed in mid-1998, and it has alleviated any potential safety concerns resulting from truck traffic entering or exiting the project site, as well as improving access to the landfill.

Topical Issue 20: Planned Haul Routes

Comments have been made that waste-hauling vehicles traveling to and from the proposed project would adversely impact the local circulation system, including Balboa Boulevard.

Response:

Regional access to the project site is provided via the following freeway systems: Antelope Valley (SR-14), Foothill (I-210), Simi Valley-San Fernando Valley (SR-118), Golden State (I-5), and San Diego (I-405) Freeways.

Immediate ingress to and egress from the project site are provided via San Fernando Road. Project-generated traffic is expected to use the following local area roadways in proximity to the site: Sepulveda Boulevard, Roxford Street, Balboa Boulevard (limited use only), Foothill Boulevard, and Yarnell Street. All traffic will enter the project site via San Fernando Road from one of the eight main access routes, including (1) north along the I-5 Freeway, (2) south along SR-14, (3) west along the I-210 Freeway, (4) southeast along the I-5 Freeway, (5) north along the I-405 Freeway, (6) east and west along the SR-118 Freeway, (7) north on San Fernando Road, and (8) north on Balboa Boulevard to San Fernando Road (this route is restricted to light vehicles only [weighing less than 6 tons], except for refuse collection vehicles that serve the local communities).¹⁷

The Draft SEIR, Section 4.13.1, Traffic, p. 4-348, identifies the general distribution pattern for the proposed City/County Landfill. The vast majority of daily traffic generated by the landfill would be truck traffic (approximately 94 percent truck traffic, 6 percent from employee-related vehicles). Project-generated traffic was distributed and assigned to the local area system based on expected origins and destinations of the refuse truck traffic. Because the project is envisioned to serve the local and regional area, the following distribution patterns are assumed for traffic distribution and generation:

- ▶ Twelve percent of the project-related traffic is expected to be distributed north of the project site on the I-5 Freeway (10 percent) and Sierra Highway (2 percent).
- ▶ Sixty-eight percent is expected to be oriented to the south on the I-5 Freeway (45 percent), San Fernando Road (21 percent), and Balboa Boulevard (2 percent).

^{17/} City Ordinance No. 161,201.

- ▶ Twenty percent is expected to be distributed east of the site on the I-210 Freeway (5 percent), Foothill Boulevard (5 percent), and Roxford Street (10 percent).

Generally, three types of trucks would be used to transport refuse to the project site: transfer trucks that bring in materials from transfer stations, curbside collection trucks that obtain wastes from the local collection routes, and pickup and small stakebed trucks that are primarily used by private contractors to bring in refuse (such as gardening and landscaping green wastes). Each type of vehicle is described below.

Transfer Trucks: Generally, wastes transported in transfer trucks would comprise about 46 percent of the refuse brought to the project site. These trucks would be received from the BLT Enterprise Central Los Angeles, Santa Monica, Beverly Hills, Culver City, and Falcon (Wilmington) transfer stations. An average round trip is estimated at 54 miles.

Curbside Collection Trucks: The proposed project would also have collection vehicles transporting refuse to the project site. It is anticipated that curbside collection vehicles from the communities of Granada Hills, Chatsworth, West San Fernando, Encino, and numerous west Los Angeles cities (e.g., Santa Monica, Culver City, Beverly Hills, and Inglewood) would transport refuse to the site. These vehicles would transport about 52 percent of the waste brought to the project site.

Local Deliveries: Local deliveries include the use of small pickups (0.75- to 1.5-ton load capacity) and stakebed trucks. Generally, these vehicles would collect and transport landscaping material, green wastes, and wood wastes. These deliveries comprise less than 2 percent of the total vehicle trips to the project site.

The Draft SEIR and Appendix B1 summarize the trip generation forecasts for the proposed project in the City. A trip end is a one-way vehicular movement either entering or departing the site. The project is forecast to generate 1,180 trip ends (one-half arriving, one-half departing) on a daily basis. Because trucks have a greater impact on traffic operation than passenger cars these trip ends are converted to its Passenger Car Equivalent (PCE) based on the methodology in the *Highway Capacity Manual*. Using the standard PCE factors of 3:1 for transfer trucks and 2:1 for curbside collection trucks, the proposed project would generate a total of 2,260 PCE trips, with 245 produced during the a.m. peak hour and 285 generated during the p.m. peak hour. The approved County Landfill, which is considered a “related” project in the SEIR, would generate 3,820 daily PCE trips, with 405 trips occurring during the a.m. peak hour and 480 during the p.m. peak hour. As for residential streets located in Granada Hills, refuse collection trucks serving the adjacent Granada Hills community use those streets only during collection periods, on trash pick-up days, and Balboa Boulevard has a 6,000-pound truck restriction south of San Fernando Road.

Mitigation measures that would reduce cumulative impacts resulting from development of the proposed project are identified in Table 4.13-9 (Revised) in this document. These measures are intended to offset the cumulative impacts due to project implementation. The Draft SEIR, Table 4.13-7, p. 4-369, Column 5, 1998 w/Mitigation, depicts the expected volume-to-capacity (V/C) and LOS values for the impacted intersections after implementation of mitigation measures. As shown in Columns 5 and 6, Project Impact Post Mitigation, therein, all cumulative project traffic is not expected to impact either local area streets or freeway systems within the region on either a project-specific or cumulative basis with the implementation of these mitigation measures. Therefore, no significant impacts are anticipated as a result of project implementation.

After the implementation of project-specific City Mitigation Measures for transportation and circulation listed in Table 4.13-9 (Revised) in the Final SEIR, no significant impacts would occur.

Topical Issue 21: Fire Prevention and Control

Comments have been raised that the proposed project could create a major fire that could spread into the adjacent community.

Response:

The project site where the proposed landfill footprint is planned is disturbed due to extensive landfilling operations that have taken place in one form or another for a period of nearly 40 years, and it would be adjacent to current County Landfill operations. However, much of the surrounding terrain is mountainous and in a natural state. The portion of the project site located within the City is designated as a Mountain Fire District. Areas adjacent to the site are covered with chaparral and coastal sage scrub that, in combination with high winds, have the potential to create an extreme fire hazard.

Brush fires have the potential to occur at or near the project site. Small onsite brush fires will be controlled by using landfill equipment such as tracked dozers, scrapers, and water trucks. In the event that a brush fire encroaches onto the project site, landfill operations would immediately cease until either the LAFD or Los Angeles County Fire Department (LACFD) is notified. However, tracked dozers could be mobilized immediately by landfill personnel to create firebreaks. All landfill personnel are trained to handle small fires and, if necessary, could provide assistance to fire personnel extinguishing small brush fires in and around the project site. The project proponent would provide heavy equipment to either the LAFD or LACFD to combat offsite brush fires near the project site. The threat of a fire igniting onsite and then spreading offsite would be considered rare because most areas around the landfill's footprint area would be graded and surficial vegetation removed, thereby eliminating combustible brush.

The primary fire concern at a landfill site is associated with a "hot load." A hot load is defined as a truck that brings ignited refuse to the landfill site. If a hot load is brought to the project site, landfill personnel will direct the load to an isolated area of the site where it would be properly extinguished with either tracked dozers, scrapers, or other fire-suppression measures, including water, dry chemical extinguishers, or smothering.

Another potential fire source is a subsurface refuse fire. This fire is triggered by the burial of a hot load igniting other refuse materials, the improper operation of the LFG collection system, or the inadvertent burial of chemical waste. Subsurface fires are dependent on waste composition, moisture content, available oxygen, ambient soil-air pressure, and the insulating characteristics of the surrounding fill-and-cover material. This type of fire is minimized by landfill design features, in-place control features used during the operation of the LFG collection and flaring system, and the proper application of cover material. The proposed design of the landfill and environmental control features will alleviate this hazard.

The potential for a subsurface fire ignited by a surface fire is also extremely remote because cover soils isolate surface fires, preventing them from igniting subsurface waste materials; the amount of waste materials above the surface is limited to the amount deposited on any given day; and landfill personnel can quickly extinguish surface fires with fire-suppression equipment. Open flames in a landfill as a result of a subsurface fire are highly unlikely. Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire or the venting of smoke or combustion of byproducts through the landfill cover material. Control of subsurface fires requires removing combustible material, eliminating the air supply, or cooling the fire zone below the ignition temperature. Because these fire control techniques are

effective in extinguishing deep landfill fires, a long-term uncontrollable subsurface fire at the project site is considered very remote.

The inactive City Landfill, access road, and operational County Landfill serve as a partial firebreak from surrounding brush areas. Located near the western perimeter ridgeline of the site is a 100,000-gallon water tank that supplies water to the inactive City Landfill and provides necessary onsite fire flow capability. Existing water lines distribute water throughout the project site. In addition, within the County, another 265,000-gallon water tank and three fire hydrants are provided to meet fire flow demands for the County landfill.

A fire response plan has been prepared for all landfill personnel. This plan details procedures to follow in the event of a fire or explosion, designates an emergency coordinator, and establishes safe havens for employees. All landfill personnel are trained in where the nearest fire extinguishers are located, how to extinguish small fires, and who to contact in case of an emergency.

With the incorporation of City Mitigation Measures for fires identified in the Draft SEIR, Section 4.14.1, Fire Emergency Medical Services, pp. 4-398 through 4-400, no significant impacts would occur.

Topical Issue 22: Compatibility with Residential Uses

Comments have been raised regarding the proximity of the site to residential uses.

Response:

The project site is topographically isolated and lies within a portion of the Santa Susana Mountains. The ± 100 acre open-space area located along the southern perimeter of the project site has undergone extensive revegetation and has been planted with over 11,000 trees. Many of these trees are native and are over 15 feet high. This open-space area is elevated several hundred feet higher (i.e., ranging in height from 1,425 to 1,975 feet above mean sea level [MSL]) than existing residential areas located to the south (i.e., approximately 1,300 to 1,400 feet above MSL).

Six trailers are located immediately east of the landfill entrance, across San Fernando Road. At final fill, the proposed landfill footprint would be located ± 700 feet from these uses. Additionally, the proposed landfill footprint would be located $\pm 1,700$ feet from the closest residential house located on Timber Ridge Drive in Granada Hills. The existing perimeter ridgeline, open-space area, and portions of the existing inactive landfill form an effective transition between residential use and proposed landfill operations and activities. The proposed project would not affect privacy nor would it hinder the interaction or movement of people, goods, or information. The proposed project would be physically compatible and consistent with its surrounding environs, including existing residential land uses located near the project site.

The proposed City/County Landfill footprint's maximum vertical height at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL. The top deck area at this height would consist of approximately 34 acres within City jurisdiction. This top deck area would be contoured to blend into the surrounding natural terrain. At this elevation located near the City/County boundary, the proposed project would descend westerly (1,885 feet MSL) to encompass land within the County portion of Sunshine Canyon and connect vertically and horizontally with the approved County Landfill footprint. The proposed landfill footprint would also descend (to 1,800 feet) southerly to abut with the existing inactive landfill. Due to its

physical location within the interior of Sunshine Canyon, the top deck of the landfill footprint will be effectively shielded from public views within Granada Hills. However, the following landfill locations would be visible: a comparatively small portion of the landfill footprint near the mouth of the canyon (1,350 feet MSL), along the northern perimeter ridgeline (1,825 feet MSL), and adjacent to the mountainous areas near O'Melveny Park (where trails exist) that are higher in elevation than the landfill (e.g., Mission Point [2,771 feet MSL]).

The perimeter ridgeline along the southern boundary of the project site (near the City/County boundary) rises to a maximum elevation of about 2,150 feet MSL. The existing southern fill limits of the inactive landfill (i.e., larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills.

Topical Issue 23: Immediate Combined City/County Landfill Operations Alternative

Comments have been raised regarding which of the alternatives considered in the Draft SEIR would be the environmentally superior alternative.

Response:

Under the Immediate Combined City/County Landfill Operations Alternative, project development would immediately result in landfilling operations being commenced within one landfill footprint located in Sunshine Canyon. In comparison with the proposed project, this alternative would have a similar landfill footprint configuration encompassing ±451 acres. Also, like the proposed project, this landfill footprint would connect with the operational ±215-acre County Landfill. Refer to Figure 5.6-1 for the conceptual base grading plan for this alternative.

This alternative would provide a net disposal capacity of 90 million tons, and unlike the proposed project, landfilling operations would occur immediately at one single working face during the first 18 to 24 months rather than at two separate working faces, and there would be a single, joint intake area with a single set of scales and supporting administrative facilities. Approximately 11,000 tpd of waste would be received at one landfill footprint. The site life would be approximately 26 years, assuming a constant intake rate of 11,000 tpd.¹⁸

Development sequencing for this alternative would result in three sequences similar to the proposed project as shown on Figure 2.5-5. Under this alternative, development of the landfill footprint would initiate in the City jurisdiction, abut and overlay portions of the inactive landfill (Sequence A), proceed in a northerly direction across the City and County boundary, and connect to the operational County Landfill (Sequence B). Once interim fill elevations are reached, the landfill footprint would extend back into the City jurisdiction (Sequence C).

Similar to the proposed project, implementation of this alternative would require some form of agreement between the City and the County to authorize common power over the entire project site. This agreement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were

^{18/} Based on 90,000,000 tons of disposal capacity ÷ 11,000 intake tonnage ÷ 312 operating days = 26.22 years of anticipated site life.

approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill. Therefore, existing permitting requirements and regulatory obligations in connection with that landfill would effectively be maintained and, if necessary, modified or amended to reflect the resulting provisions established under the subject agreement.

Under this alternative, less significant impacts would occur (for up to 2 years) because landfilling operations would be contained at a single working face area. In comparison to the proposed project, the following environmental impacts would be reduced:

- ▶ During the first 18 to 24 months, less daily fugitive dust emissions would be generated because landfilling operations would be contained at one working face area instead of two separate working faces. During high-wind episodes (i.e., Santa Ana wind conditions), landfilling operations would be performed at wind-protected areas of the site within either jurisdiction. Potential offsite fugitive dust emissions would be reduced due to the flexible location of landfilling operations.
- ▶ During the first 18 to 24 months, less daily fugitive dust and mobile emissions would be generated during landfilling operations because refuse disposal would be contained within one working face of the landfill rather than two separate areas.
- ▶ During the first 18 to 24 months, the landfilling operations would result in less significant risk-of-upset conditions from litter generation because landfilling would be confined to wind-protected areas of the project site during high wind conditions. Offsite windblown litter would be reduced due to the flexible location of the active working face area.
- ▶ During the first 18 to 24 months, the landfilling operations would result in less significant risk-of-upset conditions from litter generation because landfilling would be confined to wind-protected areas of the project site during high wind conditions. Offsite windblown litter would be reduced due to the flexible location of the active working face area.
- ▶ This alternative would provide easier access to City and County Fire Departments and other emergency personnel due to reduced onsite vehicle congestion as a result of confining landfilling operations to one working face. The use of a single working face area would result in the need for less water consumption for dust control purposes.

Development of this alternative would reduce the long-term capital outlay necessary for infrastructure improvements because in-place infrastructure would be used. In comparison with the proposed project, this alternative would meet all development and solid waste objectives. Implementation of this alternative would facilitate the waste planning efforts of the City and County necessary to meet their short-, mid-, and long-term planning needs.

The Immediate Combined City/County Landfill Operations Alternative would have less significant impacts than the proposed project for the first 18 to 24 months. Specifically, this alternative would result in less significant impacts on air quality (e.g., dust emissions), create less potential risk-of-upset conditions (windblown litter and worker safety associated with onsite vehicle routing), improve public services response (fire and emergency service access), and generate less potential demand for onsite water consumption.

Implementation of this alternative would not result in any area-wide or regional impacts that would be greater than the proposed project. Overall, this alternative would be considered environmentally superior to the proposed City/County Landfill Project because environmental impacts would be less for up to a 2-year period.

Topical Issue 24: Request for General Plan Amendment/Zone Change

Questions have been raised regarding the project proponent's request for a General Plan Amendment/Zone Change for the proposed project and the 5-acre adjoining parcel located northeast of the project site.

Response:

Prior to the filing of project applications on the proposed City/County Landfill, the project proponent was informed by the City Zoning Administrator that, for the landfill being proposed, the consideration of a GPA/ZC for the entire ±494 acre project site within City jurisdiction would be preferable to the variance process that had entitled the prior operational City Landfill (1966 through 1991). The City did not propose the zone change; it simply determined that such an entitlement process would be superior to the previous zone variance. Additionally, prior to the filing of the current application, in December 1990, John J. Parker, Associate Zoning Administrator, stated the following:

“In the opinion of the Administrator, no future entitlements with respect to Sunshine Canyon Landfill should be considered under a zone variance process. The findings for a zone variance do not speak to the merits of the project, but more directly to hardships, special circumstances and property rights, which are arguably not the most appropriate findings for this type of case.”

Mr. Parker went on to say that a change of both the zone and General Plan designation on the property to a (Q) M3 Zone and a Heavy Industry use designation would be a more appropriate discretionary entitlement.

The change of land use designation to “Heavy Industrial” and the rezoning of the property to M3 would allow for the proposed landfill project, but conditions of the General Plan Amendment and “Q” conditions (qualified classification) attached to the rezoning would limit the uses on the project site to either those existing uses or those related to the proposed landfiling activities. The “Q” qualified classification may be designated by the City so that the project site would not be utilized for all the uses ordinarily permitted within the M3 zone classification and/or that the development of the site would conform to certain specified standards, if such limitations are deemed necessary, to secure an appropriate development consistent with the objectives of the General Plan and ensure compatibility with surrounding property. (Refer to the Los Angeles Municipal Code, §12.32 J.) Limiting “Q” conditions could be imposed at the time of General Plan Amendment/zone change approval which could prohibit non-landfill-related, industrial uses and activities on the property, including the M3 zone uses specifically mentioned during the public hearing on October 29, 1998, such as manufacturing plants that produce chemicals, acetylene, gas, chlorine gas, disinfectants, pesticides, paint, plastics, petroleum products and glass; and industrial uses such as bronze casting, automotive dismantling, canneries, foundries, grain fermenting, and lumber yards. When the landfill stops accepting waste, State regulations will limit the uses that will be permitted. However, beneficial landfill uses which utilize byproducts from the natural decomposition of waste in the landfill would not and should not be prohibited. Such beneficial uses could include the productive use of landfill gas as fuel or the conversion of such gas into energy. Currently, such gas is flared at the County Landfill.

Both state¹⁹ and federal²⁰ regulations require the owner or operator of a landfill to maintain and monitor the landfill for a minimum period of 30 years after the completion of landfill closure. A Closure Plan must be approved in addition to a Post-closure Maintenance Plan. Under these plans, a landfill must be closely monitored during this period to ensure that leachate, gas, dust, drainage and erosion controls are sufficiently maintained and that other performance standards incorporated into landfill design are being met to satisfy public health and safety requirements. An emergency response plan and site security measures are required, and any post-closure land use or construction must be approved by various State and local regulatory agencies. These maintenance and monitoring activities during the closure and post-closure periods are industrial in nature, with associated legal requirements and liability, rendering most non-industrial uses of the landfill property infeasible during the closure and post-closure periods and justifying an industrial designation and corresponding zone throughout the entire closure/post-closure process.

Facilities (i.e., portable trailers) currently located on County land within Sunshine Canyon would be relocated and related site improvements would result in the following construction in the City (with approximate floor area of each structure): caretaker unit (1,400 sq. ft.); administration building (4,000 sq. ft.); maintenance building (1,700 sq. ft.); scale house (800 sq. ft.); leachate treatment plant (5,000 sq. ft.); environmental learning center (1,440 sq. ft.); and employee lunch room and locker facilities (1,800 sq. ft.). Related parking areas would also be developed. Figure 2.4-5 (Revised) in the Final SEIR indicates the proposed locations of these facilities. The public dropoff and the buyback area for recycling center are no longer proposed. The nursery shown on Figure 2.4-5 (Revised) is currently proposed to be located in the northerly area of the City portion of the site. The existing access road in the City will be relocated as landfilling progresses within Sunshine Canyon, and it is depicted in Figure 2.5-2 (Revised) of the Final SEIR on an area of approximately 3.3 acres.

Additionally, the development, operation, maintenance, and monitoring of a Class III landfill would not permit the disposal of hazardous waste. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility. In this regard, a comprehensive hazardous load checking program would be implemented, which would include employees visually inspecting incoming loads at the scale house area, using television monitors and radiation detectors at the landfill entrance, performing random load checks of vehicles, and providing spotters at the active working face of the landfill.

An adjoining approximately 5-acre remnant portion of Tract 9673, located northeast of the proposed landfill, is zoned A1-1 and is not owned by the Applicant. The tract map for Tract 9673 was recorded in 1927. According to title research, all of the lots in the tract were acquired by the State of California (by deeds and/or final orders of condemnation) some time in the 1960s for construction of the Golden State Freeway. The latest AP map available (AP Book 2601, page 4) shows that the Golden State I-5 Freeway completely enveloped the tract with all parcels tied together. In 1983, a Director's Deed from Caltrans was recorded indicating that the property was excess land and landlocked. This Deed recites the following on page 3:

There shall be no abutter's rights of access appurtenant to the above-described real property in and to the adjacent State freeway. The above-described real property is landlocked and without any

^{19/} Regulations of the California Integrated Waste Management Board ("CIWMB") set forth in California Code of Regulations ("CCR") Title 27, Division 2, Chapter 3, Subchapter 5, §§ 20950 et seq., § 21180

^{20/} 40 Code of Federal Regulations ("CFR"), Part 258, Subtitle D; Subpart F, § 258.61

direct access to the freeway or to any public or private road. The State of California is without obligation or liability to provide access to the said real property.

According to Chicago Title, the property appears never to have been insured by a title company. Based on the amount of documentary transfer tax paid in 1983 (i.e., \$12.10), the consideration paid for this parcel is estimated at approximately \$11,000.

Given the landlocked nature of this remnant parcel, it no longer meets the definition of a lot under the Los Angeles Municipal Code. This property has remained vacant and unused since 1927 and cannot be developed. It was purchased with full knowledge of its lack of access. To avoid creating a spot zone of a small island of A1-zoned property, one of the most restrictive zones, surrounded by industrial uses and M3 and PF zoned property, the least restrictive zones, the property should be re-zoned to [Q]M3, as an "added area," in the pending zone change proceedings, with uses restricted to those permitted in adjoining property and with all other uses subject to review and approval by a Zoning Administrator.

Additional information regarding the proposed City/County Landfill's consistency with the Granada Hills-Knollwood Community Plan can be found in Topical Issue 15.

Topical Issue 25: Performance of a Health Risk Assessment

Comments have been made regarding the need to prepare a health study vs. a health risk assessment for the proposed project and concerns have been raised by the Los Angeles Unified School District regarding the long-term health impacts of diesel particulate matter and NO₂ levels.

Response:

No new information has been presented that would warrant an additional health study. Prior to preparation of the Draft SEIR, comments were received from individuals during the NOP process that pertained to potential human health impacts (e.g., incidence of cancer, respiratory ailments and diseases, allergies, skin disorders, and airborne toxins). Most of the concerns were raised by individuals who resided in the Granada Hills area. In response to these concerns, City Planning staff initiated investigations and had several meetings with leading medical authorities, such as Paul J. Papanek, M.D., M.P.H. (Chief, Toxics Epidemiology Program, Disease Control Programs of the County of Los Angeles, Department of Health Services) and Thomas M. Mack, M.D., M.P.H. (Professor of Preventive Medicine, University of Southern California, School of Medicine). Based on the review of existing information and the advice of these experts, City Planning staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.

It should be noted that Dr. Papanek indicated the potential for significant human health risk impacts to be statistically attributable to a Class III landfill is generally low. His comments were based on his extensive review of published scientific studies of landfill sites located throughout California. Dr. Mack, who has designed, researched, and prepared a number of epidemiological studies for hazardous Class I waste landfills, indicated it would be unlikely that an epidemiological study for the proposed project would produce a definitive finding linking health problems of area residents to the landfill site. In summary, based on the results of this information and analysis, the proposed project will not have a significant effect on human health in the area of the project.

In addition, and as discussed in the Draft SEIR, Section 4.2.9, Health Risk Analysis, p. 4-76, the use of SCREEN2 as a screening level assessment for CEQA purposes was established in a modeling protocol received and reviewed by SCAQMD staff. The protocol specified use of SCREEN2 for the initial assessment. If the results did not establish a less than significant impact with an adequate margin of safety, then BEEST-X, a hybrid combination of ISCST2 and COMPLEX 1, was to be used. This protocol was followed in the Draft SEIR. SCREEN2 model input/output assumptions and derivations were presented in detail in the Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, and include the computer output sheets with all specified input parameters. The SCREEN2 analysis shows that toxic emissions are below the SCAQMD significance threshold of one in 1,000,000 for cumulative maximum individual cancer risk. In response to comments raised by the South Coast Air Quality Management District additional model studies were run using the ISCST3 model and the 1998 version of EMFAC7G. These results are included in the Final SEIR, Appendices D2 and D3 and concluded that cancer risk and health risk were below significant threshold levels.

The City's Zoning Administrator originally determined in September 1988 that a health study was desirable because information in the record pertaining to this issue was not adequate to prove adverse health effects. It should also be noted that in response to his request, the project proponent submitted a proposal to the City Zoning Administrator for the purpose of conducting a health study. Lengthy discussions with the City ensued regarding revisions to the proposal, and modifications to the proposal were submitted. However, the City Zoning Administrator, possibly because of later statements by qualified epidemiologists regarding the absence of a significant health risk and the problematic nature of any "health study" in the subject neighborhood, did not act on that proposal. Specifically, the Zoning Administrator stated:

Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contained no scientific or expert documentation relating to this.

With respect to the "informal health survey" sent by landfill opponents to area residents in 1988, the Zoning Administrator stated in his findings (September 1988) regarding Case No. ZA 17804 (RV):

Health Impacts - This major allegation remains unproven. The health survey mailed to 5,000 residents was not scientific in its consideration. It would have been virtually impossible to answer it, absent perfect health, without appearing to indict the landfill for problems of allergies, respiratory ailments, skin diseases, etc. The questions and answers are not statistically valid, due to their construction. It would also have been helpful to have had expert (medical) input. A major question which the Administrator has is: Are the rates of allergy, respiratory illness, etc., abnormal for this area, in consideration of the frequently high winds blowing from the north and the proximity of a northerly hinterland with substantial natural vegetation? Under those conditions, a prevalence of allergies (particularly in the Spring) would not be surprising.

Concerns were raised by the Los Angeles Unified School District at the October 29, 1998 public hearing regarding the long-term health impact of diesel particulate matter, and the potential for exceedance of the nitrogen dioxide (NO₂) standard as a result of emissions by heavy duty diesel vehicles. (This submittal by the LAUSD is included in Attachment F, Commenter 111 of the Public Hearing Reference Materials.) A review of LAUSD's evaluation by the Applicant's air quality expert, ENVIRON, shows that the LAUSD

analysis is flawed and that the landfill will result in neither an adverse health impact, nor an exceedance of the NO₂ standard at the Van Gogh Elementary School.

The LAUSD evaluated the carcinogenic impact that diesel particulate emitted from heavy duty diesel vehicles at the landfill may have on students at the Van Gogh Elementary School and found an adjusted lifetime cancer risk of 1.24×10^{-5} as compared to the State of California's Proposition 65 threshold of 1×10^{-5} . There are several aspects of the LAUSD's analysis that led to an overestimation of impacts from the landfill: source configuration, emissions factors for heavy duty diesel equipment, risk assessment parameters, and source parameters.

For evaluating carcinogenic impacts, it is appropriate to look at the long-term (i.e., 70 years) impacts of operations. The LAUSD estimated a one-year average concentration of diesel particulate at the school using the operating configuration similar to that presented in the FSEIR. However, that configuration was used in the FSEIR to represent the highest impact of dust emissions on the community when operations are at the closest proximity to the residences. Therefore the use of the operating configuration that had the highest impacts on the nearest residential community overestimates the long term impacts. While the source configuration was appropriate for the FSEIR evaluations of fugitive dust emissions (where the longest averaging period was one year) it is inappropriate for the evaluation of the impact of diesel exhaust, where the averaging time is at least 25 years (i.e., the life of the landfill).

To properly evaluate the impacts of long-term operations, emissions from heavy duty diesel vehicles should be evaluated as if they emanate from the entire surface of the landfill, not only the closest possible area of operations. If the modeling is revised only by using the appropriate source area, and retaining all other LAUSD assumptions, the carcinogenic impacts from diesel particulate at the Van Gogh Elementary School drop below a level of concern. The new risk level is 7×10^{-6} ; this is below the State of California's threshold of 1×10^{-5} .

The LAUSD's analysis also overestimated the levels of emissions of particulate matter from the diesel exhaust. The analysis assumed that today's heavy equipment is representative of the current fleet, which includes a mix of older and newer equipment. However, since the project's long-term impacts are evaluated over the next 25 years it is reasonable to use a fleet of vehicles that are model year 1998 or newer. If it is assumed that all vehicles are 1998 or newer for future operations, and the USEPA's most recent certification data are used, then the emissions rates drop by more than 40%, and the resulting health impact discussed above, which is already below a level of significance, also drops by more than 40%. Thus, the health impact that is calculated above to be below a level of significance, is reduced again, putting the risk at 4×10^{-6} .

The LAUSD's analysis used EMFAC7F to model emissions from on-road vehicles such as garbage trucks and water trucks, with the claim that EMFAC7F is more appropriate for microscale analysis than the EMFAC7G, which was used in the FSEIR. In fact EMFAC7G is the most recent version of the model and has replaced EMFAC7F. The California Air Resources Board (CARB) has agreed to allow the use of EMFAC7F instead of EMFAC7G only for microscale analysis, which is an analysis performed for transportation projects for the pollutant carbon monoxide (CO). One of the major changes from EMFAC7F to EMFAC7G was the addition of emissions for aggressive driving (high speeds and/or accelerations) that were not included in EMFAC7F, and this change increases CO emissions substantially. For analyses of all emissions other than CO EMFAC7G is the appropriate model to use. There are substantial differences in the methods used to calculate heavy duty diesel vehicle particulate matter emission factors between EMFAC7F

and EMFAC7G. These methodological changes produce substantial decreases in emissions, which would further lower the health impact.

There are several other aspects to the LAUSD's analysis that led to an overestimation of carcinogenic impacts that may result from particulate emissions from tailpipes. First, the LAUSD used elevated area sources to simulate the tailpipe exhaust from an area. Area sources do not take into account the impacts of changing elevation (they are "terrain following"). If the LAUSD had used volume sources, which are not terrain following, along with the proper elevations at the site, the elevation difference between the release point and the school that is in excess of 100 meters would have resulted in a significant decrease in the modeled concentrations. Second, the LAUSD's analysis considered emissions from dirt trucks on the working face area, other landfill areas, and roads in between areas at the landfill. In its analysis, the LAUSD assumed eight hours of operational emissions from the dirt trucks in the landfill areas and approximately a half an hour of operational emissions from the dirt trucks on the unpaved roads. The dirt trucks are each only operating for a total of eight hours according to the FSEIR not a total of 8.5 hours. It is appropriate to subtract the time the dirt trucks spend on the unpaved roads from the time the dirt trucks spend on different landfill areas. This will also result in a lower concentration at the school.

The LAUSD's NO₂ analysis also overpredicts impacts from the landfill. The results from the LAUSD NO₂ analysis stated that project related emissions may combine with existing background concentrations and exceed the State Ambient Air Quality Standard. The LAUSD's analysis used emission rates that are far higher than those that will exist when the section of the landfill that is the closest to the residences is being used. It is also a screening-level analysis, which does not consider that all NO_x is not emitted as NO₂.

The LAUSD used values for NO_x emissions for off-road heavy equipment from the USEPA's Report No. NR-009 for the years 1996-2001. The area of the landfill that is being modeled by the LAUSD (i.e., closest to residential areas) will not be active until near the end of the landfill life, 2023. As landfill equipment lasts no longer than 10 years, the equipment working on that area would be no older than the 2013 model year. Using the emission rates for the newer model years results in concentrations at the Van Gogh Elementary School below that of the California Ambient Air Quality Standards, even when including background levels.

There are several factors which would result in even lower values of NO₂. For example, the LAUSD did not consider that the majority of nitrogen oxide (NO_x) emitted from exhaust is nitric oxide (NO) rather than NO₂. Although NO can convert to NO₂ in the air over time, it is neither rapid nor complete and is limited by the amount of ozone (O₃) in the ambient air. Therefore, the analysis provided by the LAUSD is an overestimate of the impacts. Furthermore, the use of elevated area sources, excessive dirt truck emissions, and the use of EMFAC7F in the LAUSD's analysis of NO₂ will also tend to overestimate NO₂ levels.

The complete text of the response to the LAUSD's analysis and supporting model runs were provided to the Hearing Examiner on December 3, 1998 and are included in the Public Hearing Reference Materials, Attachment H.

Additional information regarding the revisions in the Final SEIR with respect to air quality data can be found in Topical Issue 27.

Topical Issue 26: Alleged Zoning Violations and Related Variance Revocation Proceedings

Comments have been made regarding the alleged zoning violations and the variance revocation proceedings when the City Landfill was in operation.

Response:

The history of BFI's alleged zoning violations and the related variance revocation proceedings was fully described in the *Additional CEQA Document* (April 1993), Section 2.4.2, City of Los Angeles Proceedings, pp. 2-6 and 2-7. The zoning proceedings were referenced within Appendix C of the same document. In summary, in 1988, the City Zoning Administrator found that some conditions of the City Landfill zoning variance had been violated, while also finding that allegations regarding other asserted violations were unfounded. The North Valley Coalition of Concerned Citizens (NVC) and BFI both filed appeals regarding the Zoning Administrator's decision.

When the City Landfill ceased operation in September 1991, the Zoning Administrator found that certain variance conditions were still enforceable, even though the landfill was inactive. BFI contested that decision and appealed that decision to the Board of Zoning Appeals (BZA). This appeal was heard by the BZA in November 1991. In its determination in December 1991, the BZA upheld the Zoning Administrator's decision to impose and enforce some of the conditions of the zoning variance.

BFI has never been found by the City to be in violation of the following zoning variance conditions that were placed on the City Landfill. In addition, the City never gave notice to BFI that any of these conditions were violated:

- Condition No. 2 (Condition of premises and parks and recreation) - Once the Closure and Post-closure period (at least 30 years) has expired, a letter will be sent to the City Parks and Recreation Department notifying them that the property would be available. In the meantime, since the landfill ceased operation, the premises have been left in a neat and orderly manner.
- Condition No. 4 (Final contour plans) - Proposed final contour plans were submitted to the Zoning Administrator and as part of the Closure and Postclosure Maintenance Plan.
- Condition No. 5 (Water tanks and litter fence) - No onsite improvements are visible to the surrounding properties in the immediate vicinity. The request for approval to perform stream enhancement work was initiated by BFI and approved by the Zoning Administrator. This work was not a condition of the zoning variance under which the City Landfill operated. No work has been performed on this matter.
- Condition No. 6 (Possible relocation of entrance roadway) - The relocation of the entrance roadway into the landfill facility was not a condition of the zoning variance under which the City Landfill operated (when it was operational). The condition stated that certain specifications will apply if the entrance and entrance roadway are relocated as a result of building the sedimentation basin.
- Condition No. 7 (City Oak Tree Ordinance) - BFI was never found by the Zoning Administrator to be in violation of any of the regulations of the Oak Tree Ordinance, and the City never gave BFI notice or indication that this condition was violated.

- Condition No. 8 (Survey) - The variance boundary survey will be accomplished during the closure approval process after additional survey monument requirements are identified by appropriate regulatory agencies.
- Condition No. 9 (Boundaries) - There have been no violations of this condition since its imposition in 1989. The City never gave BFI notice or indication that this condition was violated.
- Condition No. 11 (Proposed sedimentation basin) - BFI had not violated this condition, since the building of the sedimentation basin is not a condition of the zoning variance. This condition states that "should the applicant proceed with construction of the sedimentation basin" certain specifications and regulations must be met. BFI has been working with the City to coordinate the installation of the sedimentation basin required for closure.
- Condition No. 12 (Removal of structures) - Facilities necessary for closure and post-closure purposes will remain onsite. BFI has sent a map depicting these facilities to the City Zoning Administrator. Those onsite facilities, which are deemed unnecessary by the City LEA, will be removed when the Closure and Post-closure Maintenance Plan is approved by the City and CIWMB. Approval of this plan has been delayed for a number of reasons, primarily the lengthy litigation brought by the City against the County and BFI relative to the County Landfill.
- Condition No. 13 (Aerial photograph) - This condition was not found by the Zoning Administrator to have been violated. This condition was imposed in 1991. An aerial photograph was ordered by BFI and was delivered to the City Zoning Administrator.
- Condition No. 14 (Operator inability to comply) - BFI is complying with this condition, and has been coordinating its compliance within its Closure and Postclosure Maintenance Plan, which is currently being processed by the City.

Three conditions were found (in 1988) by the City to be violated during the zone revocation proceedings. These conditions included:

- Condition No. 1 (Vertical height of landfill operations)
- Condition No. 3 (Setback requirements) - The Bureau of Sanitation issued a violation (in 1990) for landfilling operations within the 600-foot setback area. However, the Zoning Administrator concluded that the violation was isolated "considering the landfill operator's overall compliance with conditions and regulations since July, 1989," and that it "was inadvertent and minor, inasmuch as no actual detriment occurred to surrounding properties." No further violation of this condition occurred, and the City never gave BFI notice or indication that this condition was violated.
- Condition No. 10 (Elevations) - In 1991, the Zoning Administrator found that BFI had failed to expressly seek approval to operate within less than 50 vertical feet of an existing ridge for this use. BFI believed that prior approval had been granted as part of a previous action, and the BZA found that there was no intention on the part of BFI to violate this condition.

BFI engaged with the City to comply with the following condition:

- Condition No. 15 (City inspections) - BFI has paid fees to the City LEA to satisfy this condition.

It should also be noted that the Zoning Administrator determined in September 1991 that certain conditions of ZA-17804(ZV) and ZA-89-1129(ZV) would remain in effect after September 21, 1991, which was the expiration date for the Sunshine Canyon Landfill to cease its landfilling operations. As noted by the Zoning Administrator, six conditions remained in effect and must be complied with by the project proponent. These six conditions included the following:

1. ZA-17804 - Condition No. 14:

That at the expiration of this grant or the completion of the land reclamation operations, the premises shall be left in a neat and orderly manner with no uncovered material, debris or waste products left on the premises. Further, upon the completion of the project, the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes.

While laws subsequent to 1966 may affect the use of the site for recreational purposes, the condition can be fulfilled by the action required.

Note: The project proponent submitted correspondence to both City and County recreation departments informing them that this condition would be complied with once closure and post-closure maintenance activities on the inactive City Landfill cease (a minimum 30-year period).

2. ZA-89-1129 - Condition No. 1:

- a. The applicant shall prepare a survey of the boundaries and elevations of the approved variance, in conformity with Conditions No. 2 and 3 herein. Said survey shall be conducted by an independent surveyor mutually acceptable to the applicant and the Office of Zoning Administration, which latter shall act on consultation with the Office of Council District 12, the Bureau of Sanitation and the Bureau of Engineering. Until such survey is completed and certified to the satisfaction of the aforementioned parties, the Bureau of Sanitation shall continue to enforce the boundaries and elevations which have been so utilized since the City Council action of July, 1989.
- b. Said independent surveyor shall be selected by the applicant within two weeks of the effective date of the subject variance action.
- c. Said survey shall be provided to the aforementioned City parties for review within ten weeks following the effective date of the subject variance action.

This condition became effective on August 31, 1991. The ten-week deadline for providing the survey (paragraph C) will obviously expire after September 21, 1991. The survey was needed to resolve the longstanding disputes over the proper location of the variance boundaries, and to clarify boundaries for any future entitlements sought within the Sunshine Canyon property.

Note: This condition was satisfied by the Applicant with the submittal of closure and post-closure maintenance plans to the City LEA, CIWMB, and LARWQCB. Included within those plans is the engineered survey of the existing inactive landfill, its exact landfill footprint boundary and ancillary facilities.

3. ZA-89-1129 - Condition No. 7:

Should the applicant proceed with construction of the sedimentation basin, said basin shall be constructed at a size which is adequate to the needs of the existing site, but which is not larger than necessary for the purpose of closure of the existing landfill. The construction shall be designed to meet minimum regulations and the determination of the final need and size shall be made by the Zoning Administrator in consultation with the appropriate regulatory agencies.

This condition will apply should the Bureau of Sanitation require the construction of a sedimentation basin within the variance area as a condition of closure.

Note: This condition will be satisfied once the development of the sedimentation basin (for closure purposes) commences. Plans and specifications for this basin were submitted as part of the closure and postclosure maintenance plans to the City, CIWMB, and LARWQCB.

4. ZA-89-1129 - Condition No. 8:

- a. Within six months after the landfill is full or after September 21, 1991, which ever occurs first, all landfill buildings, scales, checking stations, recycling center and facilities to accept trash shall be dismantled and removed from the site, except for offices and facilities necessary to monitor the closure plans.
- b. Prior to establishment or continuance of said facilities after September 21, 1991, a plan(s) shall be submitted to the Zoning Administrator along with evidence that said facilities are strictly for the purpose of monitoring the closure plans for the City landfill portion of the site. The Zoning Administrator shall consult with the various regulatory agencies to verify that the facilities are for said purpose before authorizing the continuance or establishment of said facilities. Further, the Zoning Administrator may condition the authorization of said facilities.

It is noted that, during the life of ZA-17804, the variance area was not subject to the Oak Tree Ordinance (Ordinance No. 153,748) due to the express exemption under LAMC 46.02(a)2. However, after the expiration of the variance on September 21, 1991, future activities within the same area will be subject to the ordinance.

Note: Closure and post-closure maintenance plans confirmed which facilities would remain onsite. Any existing facilities remaining onsite were authorized by the City.

5. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 1:

If the applicant cannot comply with the provisions of a condition of the variances due to a determination, requirement, etc. of a governmental agency, the applicant shall secure a written statement from the head of said agency explaining why the condition or provisions of the condition cannot be met and whether there is an alternative for meeting the condition or how the condition could be modified to enable the compliance intended.

Note: The project proponent has not had to obtain such a statement.

6. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 2:

The applicant shall pay for an inspector to be assigned by the City to monitor compliance with all the conditions of the variances which were not complied with prior to the expiration of the subject variance for the filling phase of the landfill project.

Note: The project proponent continues to pay a yearly fees to the City LEA to monitor the inactive landfill, even though this facility has ceased accepting waste. The City LEA agreed that as a result of the fees being paid, and the ability to monitor compliance at this facility, the project proponent has satisfy this condition.

Topical Issue 27: Revised Air Quality Data

Comments have been made regarding the revisions in the Final SEIR with respect to air quality data.

Response:

Several components of the air quality analyses presented in Section 4.2, Air Quality of the Draft SEIR were revised to incorporate comments received by the SCAQMD, County LEA, and LAUSD. Many of the comments resulted in more refined emissions estimates and modeled impacts than shown in the Draft SEIR. Section 4.2, Air Quality, of the Draft SEIR was revised to incorporate these changes in one location, rather than simply reporting the revised estimates in the responses to comments. This information is incorporated into this Final SEIR as Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality.

Since the Draft SEIR was prepared, certain reference documents and analytical tools relied upon to conduct the air quality analyses have been updated. Specifically, the Draft SEIR circulated for public comment in July 1997 used a standard reference document (AP-42) to calculate emissions from certain operational and construction activities and to quantify the effectiveness of some mitigation measures. The 1985 version of AP-42 was used to calculate exhaust and fugitive dust emissions. However, AP-42 was updated in 1995. This version reflects more refined emission factors for fugitive dust emissions. (The exhaust emission factors in AP-42 have not yet been updated.) In the revised air quality analyses, the construction and operational emissions have been updated to reflect the new emission factors in the 1995 version of AP-42. This has resulted in an increase in emissions from some sources and in other cases estimates were reduced. For example, the emission factor for dust from vehicles driving over paved roads was reduced, and as a result, the estimate of PM₁₀ emissions dropped substantially.

In addition, the Draft SEIR used the SCREEN 2 model to perform the Health Risk Analysis for the flares and EMFAC7ED to model vehicle emissions. The SCAQMD in its comments recommended the use of the ISCST3 model and the 1998 version of EMFAC7G. Additional modeling studies were run using the suggested models and the results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air

Quality; and Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment in this document.

Landfill gas generation and gas composition rates have been revised to reflect current conditions at the project site. In regard to gas generation rates, the County FEIR used projections based on eight flares and gas composition characteristics typical of landfills in general. Based on experience gained from the gas collection system at the existing inactive City Landfill and the County Landfill, gas generation from the proposed project is now expected to be substantially lower than originally projected. Accordingly, the project proponent anticipates only five flares will be required to flare gas generated for the entire City/County Landfill. (These will include the existing flare at the existing inactive City Landfill, two flares at the County Landfill [one now in operation and one permitted but not constructed] and two new flares associated with the proposed project.) The information on gas composition was also updated to reflect onsite data from the gas flared by the two flares already in operation. The revised modeling study now uses the maximum permitted capacity of five flares for the worst-case analysis and onsite gas composition data. As a result, emissions estimates from the flares have increased and SO_x emissions now exceed the SCAQMD's CEQA significance threshold. These results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality; and Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment of this document.

The revisions to Section 4.2, Air Quality, of the Draft SEIR do not identify any new emission sources or contaminants. These revisions provide a more accurate estimate of emissions from landfill construction and operation, and impact on air quality relating to the comments made by the SCAQMD, County LEA, and the LAUSD.

Additional information regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills can be found in Topical Issue 3.

Topical Issue 28: Working Arrangement Between the City and County

Comments have been made regarding the working arrangement that would be necessary between the City and County to construct, operate, and maintain the landfill.

Response:

The concept of "joint operation" refers to the proposed working arrangement between the City and County that would recognize and maintain discretionary approvals, permitting requirements, regulatory obligations, contractual agreements, and other arrangements needed for the joint development, construction, operation and maintenance of a landfill working face area within either jurisdiction of Sunshine Canyon, including the division of Local Enforcement Agency (LEA) responsibility and a percentage of proceeds from the disposal of waste. The potential form of agreement between the City and County has been discussed with City Planning staff, the Program Manager of the Environmental Affairs Department, the County Department of Public Works (DPW), and the County Department of Health Services (DHS). As stated, in pertinent part, in the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38:

It is anticipated that . . . both jurisdictions will execute a working arrangement, regarding the joint operation of the City/County Landfill. This arrangement would recognize existing discretionary

approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill.

That agreement would state the purposes and powers to be exercised by both jurisdictions, including, but not limited to, the following:

- ▶ combine City/County LEA monitoring and enforcement activities at the proposed City/County Landfill into a single authority, with one jurisdiction taking the lead in overseeing operational activities at the landfill, in order to avoid duplication of work and effort and ensure efficient administration, but the selection of the lead jurisdiction has not yet occurred;
- ▶ allow the mutual use of the access road, ancillary facilities and areas, and environmental protection and control systems;
- ▶ set reimbursement obligations;
- ▶ establish tipping fee structures; and
- ▶ establish revenue sharing by the City and County.

The working agreement could take the form of a standard State-authorized development agreement that the applicant would enter into with both the City and the County. Issues to be covered in such an agreement would include, in addition to the vesting of each jurisdiction's approved entitlements for the landfill, the imposition of tipping fees, means of dividing the tipping fee revenue between the jurisdictions and the various operational responsibilities detailed above. With respect to the revenue to be received by the respective jurisdictions, currently, condition 14 of the County Landfill CUP provides for the permittee to pay to the County a fee equal to ten percent of the sum of the following:

- ▶ The net tipping fees collected at the landfill, (including any fees received as a part of a materials recovery program), the net tipping fee being the total collected less any other fees or taxes imposed by any federal, state or local agency and included in the fee charged at the landfill entrance;
- ▶ Gas-to-energy or direct gas sale revenues, less any federal, state, or local fees or taxes included in such revenues.

This condition provides a credit mechanism if the County imposes a business tax on landfill revenues, and specifies that if at any time during the life of the CUP the permittee is operating the landfill within both unincorporated and City territory, then the required fee would be reduced in proportion to the relative amounts of waste placed or processed and the gas produced and used or sold in the two jurisdictions. In the case of the proposed City/County Landfill, assuming the City were to impose a similar 10% tipping fee, an allocation of the 10% tipping fee could be made based on the percentage of remaining capacity within the City and County portions of the landfill footprint area, and the fee could be collected and divided between the City and County pursuant to such allocation. The division of the fee revenue would be made regardless of where the waste is actually disposed of within the landfill footprint. The agreement could also provide for an audit every year.

Topical Issue 29: Liner System and its Ability to Withstand Earthquakes

Concerns have been raised regarding the proposed liner system and its ability to withstand significant earthquakes.

Response:

The landfill has been designed to withstand a peak ground acceleration of greater than 1.0 g, as discussed on page 15 of Appendix C15 of the Draft SEIR. For the Sunshine Canyon County Extension Landfill, the calculated permanent movement of the waste mass relative to the liner system in this 1.0-g earthquake is 5.3 inches (Table 5-5, referenced on page 39 of the Draft SEIR, Appendix C15). This relative movement is a result of the earthquake ground vibrations (strong shaking) and is different from the tectonic movement of the ground beneath the landfill in the earthquake. This calculated relative movement of 5.3 inches is less than the maximum value considered acceptable by the Regional Water Quality Control Board (RWQCB), the Department of Water Resources, and the landfill engineering community.

Testimony at the public hearing confused this relative displacement between the waste mass and liner system with the tectonic displacement experienced by the ground in an earthquake. The earthquake displacements that occurred in the region following the San Fernando and Northridge Earthquakes were regional tectonic displacements. The landfill can withstand regional tectonic displacements in excess of ten feet, as regional tectonic displacements do not put any stress on the liner system.

The design ground motions were developed based upon the most recent information on regional seismicity from the USC Earthquake Center (SCEC). It is the responsibility of RWQCB, as lead agency for the liner design, to review and approve the design. The ground motions were subject to intense scrutiny in the RWQCB hearings for the County Landfill. At those hearings, Dr. Norman Abramson, an SCEC principal investigator hired by the North Valley Coalition, testified that he had reviewed the design ground motions for the landfill and had found them to be appropriate. The RWQCB uses the State Department of Water Resources as an expert for earthquake design. The design ground motions were also reviewed and approved by earthquake experts from the California Department of Water Resources, Division of Engineering, Civil Engineering Branch. Additional information regarding the design of the proposed landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems can be found in Topical Issue 1. Additional information regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake and the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake can be found in Topical Issue 2.

Topical Issue 30: Request for Additional Open Space Dedication

Concerns were raised in written comments from the public hearing regarding the inadequacy of open space surrounding the site. The following potential mitigation measures were suggested:

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at the northern end of the Weldon Canyon Motorway at its junction with Coltrane Street. (This would provide access to the Weldon Canyon Motorway by way of trail to connect with other access routes provided through the County conditional use grant).

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at Mission Point that includes the peak west of and 1/3 of a mile from O'Melveny Park. (This would provide public access to an area that has been very popular for decades with hikers, bicyclists, equestrians, and nature lovers.)

Acquire and transfer ownership to a public park agency or a nature conservancy, the land located at the headwater area of Rice Canyon Creek. (This is to further the development of Santa Clarita Woodlands Park as part of a similar effort in the County conditional use grant.)

Response:

Recognizing the need to preserve the character of the surrounding area, as well as the deficiency of park lands, Sunshine Canyon Landfill will maintain the existing open space area situated south of the City Landfill, which separates Sunshine Canyon Landfill from the nearest residential units in Granada Hills and consists of approximately 100 acres, as open space under the proposed project. In this regard, the project proponent has decided to eliminate this 100-acre area from its request for a general plan amendment and zone change, which would mean the continuation of the existing "Open Space" designation and A1 zoning for this property. The existing uses in this open space area include a caretaker house, a cellular telephone tower and equipment shed, surface and subsurface pipelines, active and inactive oil wells, above-ground oil storage tanks, and a landfill liquid separator and sewer connection. The only regular physical activity in the area is infrequent maintenance of the cellular telephone tower and daily removal of oil from production storage tanks by an oil tanker truck. The project proponent expects no change of this activity in the future.

As for other properties owned by the Applicant in the vicinity of the project, their status is as follows:

- Approximately 426 acres of East Canyon, which is situated immediately west of Sunshine Canyon, are being dedicated to the Santa Monica Mountains Conservancy.
- The Applicant is also conveying to the Conservancy easements for open space and recreational purposes over approximately 81 acres of the perimeter area between East Canyon and Sunshine Canyon and along the northeast perimeter of Sunshine Canyon. This acreage is a part of the Santa Clarita Woodlands Park. This open space dedication fills a need in the area for a regional park in the Northwest Valley, and is consistent with needs expressed in the Los Angeles Citywide General Plan Framework DEIR, as well as the County of Los Angeles General Plan, Conservation, Open Space, and Recreational Element.
- Moreover, the Applicant is currently working to acquire approximately 480 acres of Bee Canyon, situated west/southwest of the proposed City/County Landfill, for preservation as open space. This area will provide the connection between O'Melveny Park and East Canyon.

Accordingly, in total, nearly 1,100 acres in the immediate vicinity of the proposed City/County Landfill will be preserved as permanent open space through the efforts of the Applicant, while the footprint of the proposed Sunshine Canyon Landfill extension would occupy a combined (City/County) total of only ±450 acres. Since dedication of open space to working space is at a ratio of more than 2:1 (open space: working space) there is not a demonstrated need for additional transfer of ownership to a conservancy or other agency beyond the open space areas which have already been provided for.

2.3 Verbal Comments Received during the Public Hearing (October 29, 1998)

The following comments were received during the public hearing held on October 29, 1998, and are summarized in the order presented from the transcript of proceedings for this public hearing and presented in Appendix E. The commenters's testimony is presented in full within the transcript and numbered to correspond with the summarized comments responses below. Copies of the public hearing contact database are provided in Appendix D of this document. All comments received will be forwarded to the City decisionmakers for their review and consideration.

**Table 2.3-1
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)**

Commenter No.	Name of Commenter	Issue(s)	Reference Response
1	Mr. Hal Bernson Councilman 12 th District	<ul style="list-style-type: none"> • Zoning Application • Liner system and its ability to withstand earthquakes • BFI's operations under the City CUP • Impacts of PM₁₀ and NO_x • Contamination of the region's water supply and high wind conditions • Health study not conducted by BFI • Alternative Landfill Technologies • Distance to residences within Granada Hills 	Refer to Topical Issue 24 and Final SEIR Response 1274 regarding the zoning application, Topical Issues 2 and 29 regarding the liner system and its ability to withstand earthquakes, Topical Issue 26 and Final SEIR Response 182 regarding BFI's operations under the City CUP, Topical Issues 3 and 27, Final SEIR Responses 254, 255, and 257 regarding PM ₁₀ and NO _x impacts, Topical Issue 3 and Final SEIR Response 157 regarding water supply contamination and high wind conditions, Topical Issue 25 and Responses 183 and 184 regarding need for health study, Final SEIR Responses 39 and 169 regarding alternative landfill technologies and Topical Issues 15 and 22 regarding distance to residential uses.
2	Ms. Miriam Jaffe Representing Assemblyman Robert Hertzberg	<ul style="list-style-type: none"> • Support for Sunshine Canyon • Environmentally sound and economically critical for both the City and County of Los Angeles • Sunshine Canyon meets all federal standards for Class II, Subtitle D landfills • Develop landfill on disturbed site • Sunshine Canyon is identified as critical to meeting Los Angeles' waste disposals requirements • The economic costs associated with more distant landfills will be greater than Sunshine Canyon 	These comments are noted.

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
3	Ms. Michelle Luse Representing Assemblyman Tom McClintock	<ul style="list-style-type: none"> • Sunshine Canyon benefits the entire region, providing a cost-effective safe haven for Class III, non-hazardous solid waste • Existing infrastructure is already in place to expand the County Landfill • Landfill will be designed and operated using the most recent technologies and strictly monitored • Limit environmental impacts by developing a landfill on an already disturbed site • Necessary to provide solid waste disposal for the residents of the City and County of Los Angeles 	These comments are noted.
4	Ms. Jill Klajic Council member of the City of Santa Clarita	<ul style="list-style-type: none"> • Impact on residents of Santa Clarita along with those residing in the San Fernando Valley • Project site is ½ mile south of the City • Project does not include an onsite Materials Recovery Facility (MRF) • MRF would assist the City and region to meet AB 939 • Concerns about the air quality section • The SEIR's Health Risk Assessment (HRA) does not indicate if Federal Clean Air Act will be met • Future technology which is cost-effective and safe for the environment must be explored • Set aside a portion of tipping fees for new alternatives • References to Elsmere Canyon as a viable landfill site should be removed from the SEIR (80 million ton landfill will not negate environmental impacts • SEIR does not address traffic, water quality, odor, dust, litter, air quality, MRF, and new technologies 	<p>Refer to Topical Issues 22 and 24 and Final SEIR Response 1649 regarding consideration of residential impacts, Final SEIR Response 243 regarding onsite MRF and AB 939 requirements, Topical Issue 27 and Responses 245 and 246 regarding the air quality section, Topical Issue 25 and Response 247 regarding HRA and Clean Air Act, Final SEIR Responses 39, 168, 169, and 936 regarding future waste disposal technology.</p> <p>The comment in regard to setting aside a portion of tipping fees for landfilling alternatives is noted.</p> <p>Refer to Final SEIR Responses 124 and 239 regarding the inclusion of Elsmere Canyon as an alternative landfill site and Topical Issues 19 and 20 (traffic); 5, 6, 7, (water quality); 4 (odor); 3 (dust); 18 (litter); and 27 (air quality).</p>

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
5	Ms. Julie Korenstein LAUSD Board of Education member	<ul style="list-style-type: none"> • Mis-zoning by the City of Los Angeles regarding landfill and residential uses • Impact on school children attending Van Gogh Elementary • Landfill emissions of nitrogen dioxide and diesel particulates 	Refer to Topical Issues 22 and 24 regarding compatibility of the landfill with residential uses, Final SEIR Response 254 regarding impacts on school children attending Van Gogh Elementary, Topical Issue 25 regarding diesel particulates, and Topical Issue 27 and Final SEIR Response 255 regarding nitrogen dioxide.
6	Mr. Bill Piazza LAUSD Environmental Health and Safety Branch	<ul style="list-style-type: none"> • Emission of nitrogen dioxide and particulates would have an adverse effect on students and staff at Van Gogh Elementary • Potential increase of nitrogen dioxide emissions generated from on-site mobile equipment • Exposure to nitrogen dioxide will alter sensory responses • Toxic potential of diesel exhaust particulates from the operation and movement of heavy duty diesel equipment • Mobile source emissions from the landfill's operation will exceed State standards established under Proposition 65 (1:100,000) • Contaminant emissions generated from operational activities are considered unacceptable and necessitate mitigation or elimination 	Refer to Topical Issue 27 regarding project emission levels, Topical Issue 25 regarding potential health effects from operational emissions (including diesel), and Final SEIR Responses 254 and 255 regarding nitrogen dioxide and particulate emissions.
7	Ms. Barbara Casparian North Valley Coalition Granada Hills	<ul style="list-style-type: none"> • Lack of revegetation efforts at Sunshine Canyon • Unplanted areas facing the 14 Freeway and Sylmar • BFI not a good neighbor 	Refer to Topical Issue 13 and Final SEIR Response 210 regarding revegetation efforts. With respect to BFI not being a good neighbor, this comment is noted.
8	Mr. Patrick Casparian North Valley Coalition Granada Hills	<ul style="list-style-type: none"> • Commuter traffic along San Fernando Road and Balboa Boulevard that originates from Palmdale/Lancaster/Castaic and Santa Clarita 	Refer to Topical Issues 19 and 20 and Final SEIR Response 106 regarding impact on areawide streets from project generated traffic and traffic mitigation measures.

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> Balboa and adjacent streets cannot accommodate additional traffic Safety of children at local schools 	
9	Ms. Bonny Herman Valley Industry and Commerce Association	<ul style="list-style-type: none"> On record supporting the expansion of Sunshine Canyon Landfill and supporting its operator, BFI Los Angeles infrastructure must parallel its growth Long-hauls to remote desert locations are costly, may be rendered infeasible VICA supports the Sunshine Canyon Landfill as a good, safe landfill 	These comments are noted.
10	Mr. Allan Cameron Comprehensive Development Consulting LASER	<ul style="list-style-type: none"> A Finding of Overriding Considerations for public benefit must be made based on demonstrated public need No basis in fact for the landfill expansion True cost of landfiling has not been provided Make a potential conditional approval that the applicant provide private third-party liability insurance for the potential cost of groundwater contamination and air quality contamination to the City 	Refer to Final SEIR Responses 891, 895, 942, and 943 regarding the need for landfill expansions as stated in the Countywide Siting Element, Topical Issue 7 regarding groundwater protection, and Topical Issue 27 and Final SEIR Response 257 regarding the revised air quality analysis.
11	Mr. Robert Lamishaw Mid-Valley Chamber of Commerce	<ul style="list-style-type: none"> Supports the Sunshine Canyon Landfill Been a landfill for over 30 years When closed created a shortage of usable space for City's trash Existing infrastructure is already in place to expand the current County Landfill Provides cost-effective short-, mid-, and long-term solid waste disposal capacity for residents and business within Los Angeles County 	These comments are noted.

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • Expansion would provide an affordable and environmentally sound trash collection and disposable alternative • Eliminate the need to haul trash great distances and prevent increases in air pollution and traffic impacts 	
12	Ms. Caren Pinson	<ul style="list-style-type: none"> • To deal with trash in the community City should take responsibility monetarily • Safety and health of children • Exposure to high level of particulates 	Refer to Topical Issues 3 and 27 and Final SEIR Responses 254, 255, 256, and 257 regarding projected emission levels including particulates.
13	Mr. Bill Allen Economic Alliance of the San Fernando Valley	<ul style="list-style-type: none"> • Support what is a reasonable solution to a pressing regional public need • Important for the economic health and growth of the San Fernando Valley • Transporting trash to distant locations would increase air pollution and freeway traffic in the region • Sunshine Canyon is the most logical and cost-effective way to counter shortages caused by closing landfills • Demonstration by BFI that it is a safe and responsible operator at Sunshine Canyon • The proposal is a clean, safe, environmentally sound, and logical continuation of an existing landfill • Hold down disposal costs, saving valuable tax dollars that can be spent on essential services • Disapproval would lead to substantial waste disposal fee increases 	These comments are noted.
14	Ms. Wendy Danner	<ul style="list-style-type: none"> • Buffer zone is supposed to be a 100 acre, completely open space area • Buffer zone is a profit zone for BFI 	Refer to Topical Issue 24 regarding zoning of the ±100 acre open-space area and Final SEIR Response 181 regarding current uses within the ±100 acre open-space area.

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> Leasing land to oil companies, full-scale oil operation area, oil production area 	
15	Mr. Bob Meyler United Chambers of Commerce of the San Fernando Valley	<ul style="list-style-type: none"> Support for the Sunshine Canyon Landfill since the area is already disturbed Keep the tipping fees in the City of Los Angeles 	These comments are noted.
16	Ms. Cathy Maguire Greater San Fernando Chamber of Commerce	<ul style="list-style-type: none"> Support for the Sunshine Canyon Landfill It is the most logical and cost-effective alternative to the landfill shortage facing the City of Los Angeles and its residents and businesses BFI has a proven record of safety Operations are state-of-the-art and environmentally sound Proven record of efficiency by being one of the lowest per ton trash disposal rates in the region BFI has demonstrated a sensitivity to the needs of the local communities and the region through their involvement in community and business organizations throughout the area Cost-effective way of extending affordable trash collection and disposal services to businesses 	These comments are noted.
17	Ms. Norah Schumacher North Valley Coalition	<ul style="list-style-type: none"> Historic impact of landfill activities on the surrounding community detrimental to the health and welfare of the community Siting of a landfill above water treatment facilities, in a wind tunnel, on land subject to earthquakes and landslides, and on an oak forest, attests to the power of money 	Refer to Topical Issue 26 and Final SEIR Responses 182 and 183 regarding impacts of historic operations on the surrounding community; Final SEIR Responses 77 and 157 (water treatment facilities); Topical Issues 3 and 18 and Final SEIR Responses 287 and 288 (wind); Topical Issues 1, 12, and 29 (earthquakes); Final SEIR Responses 6 and 361-369 (landslides); and Topical Issue 11 and Final SEIR Response 1412 (oak trees).

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • The project will bring air contamination in the form of deadly airborne pollutants that cannot be mitigated • City Council sustained findings that the landfill was causing conditions that were materially detrimental to the surrounding neighborhood and filed suit to stop the project • Attempts by BFI to cure dust violations were ineffective • City's promise to close the dump and make it into parkland feel betrayed • Closure of landfills fought by the NVC and landfills should not be sited near residences 	Also refer to Topical Issues 25 and 27, and Final SEIR Responses 68, 254-257, 278, and 316 regarding project emissions and potential health affects; and Topical Issue 26 and Final SEIR Response 182 regarding compliance record for previous City Landfill operational history (including dust control violations); Final SEIR Response 205 and 1296 regarding postclosure recreational use; and Final SEIR Topical Issue 22 regarding compatibility with residential uses.
18	Mr. Allen Hecht	<ul style="list-style-type: none"> • Issues regarding the health study • Landfill in the '50s was an illegal, unrestricted, and unwarranted dump site - City granted its own variance that would legalize the original violation • In the 70's the City permitted homes to be built in proximity to the southern boundary of the landfill • Hydrogeologic connection between the site and the Van Owen reservoir • Community has to put up with dust, litter, trash, and the odors • In 1991, BFI had many violations pending against them, landfill ordered closed by the City • Issues regarding the closed landfill, its reversion to a recreational use, intentions of City Department of Parks and Recreation 	Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding need for health study, Draft SEIR Section 1.5.2, pp. 1-5 and 1-6 and Appendix C5 regarding prior operational history of the City Landfill, Topical Issue 22 and Final SEIR Response 180 regarding effect of landfill operations on residential uses, Topical Issue 6 regarding hydrogeologic connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin and Response 157 regarding the Los Angeles Reservoir (Van Norman Dam), Topical Issue 26 and Final SEIR Response 182 regarding project history and compliance record, and Final SEIR Responses 205 and 1296 regarding postclosure recreational use.
19	Mr. Wayde Hunter North Valley Coalition	<ul style="list-style-type: none"> • Opposed to the expansion of the landfill back into the City and the granting of the M3 zone 	Refer to Topical Issue 24 regarding the requested General Plan Amendment/Zone Change, Topical Issue 26 and Final SEIR

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • BFI in 1978 began taking in more trash than the amount indicated in their operating permit • BFI violations regarding amount of tonnage and operating hours • BFI violations regarding elevations and going beyond their boundaries into significant ecological area No. 20 • Removal of oak woodlands without a permit • Encroachment into water areas and compromised federally protected wetlands • Revocation action filed by the City in 1988 • City decision regarding violations in 1988 (prescribed elevations, trash beyond the variance line, landfill too close to the water course, landfill operating too close to the ridgeline) • Curative variance requested by BFI to encompass land that BFI illegally used • BFI ordered to move operations further away from residential areas near the I-5 Freeway • Mitigations were ordered by the Zoning Administrator that were not complied with by BFI • Request for a City inspector to monitor onsite compliance • Several conditions not complied with by BFI (e.g., health study, restoration of the water course, replacing oaks in the North Canyon, hiring of an inspector to oversee closure, and providing an accurate survey) • City promised open space and recreational land • Past violations of dust, trash, odors 	<p>Response 182 regarding alleged violation and related variance revocation proceedings, and Final SEIR Responses 205 and 1296 regarding postclosure recreational use.</p> <p>The comment in regard to setting aside a portion of tipping fees for landfilling alternatives is noted.</p> <p>BFI has never been found by the City to be in violation of tonnage or operating hour restrictions.</p>
20	Mr. Sheldon Mende	<ul style="list-style-type: none"> • Impressed with landfill operation 	These comments are noted.

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	Encino Chamber of Commerce	<ul style="list-style-type: none"> Wants people to work together rather than create animosity 	
21	Mr. Edward Flores Carry Ranch Homeowners Assoc.	<ul style="list-style-type: none"> Understood that the landfill would not be expanded High winds and dust in the area Odors from the dump Concerns over dust, traffic, and odors 	Refer to Topical Issue 3 regarding high winds and dust, Topical Issue 4 regarding odors, and Topical Issues 19 and 20 regarding traffic.
22	Dr. Sandra Klasky (read by Ms. Ann Kinzele representing the Reseda Chamber of Commerce)	<ul style="list-style-type: none"> Attesting to the significant responsibility and contributory role BFI placed on the San Fernando Valley (e.g., community relations, community participation, and business and education partnership) BFI has a long history with California State University Northridge offering many educational and employment opportunities BFI has opened its facilities and expertise to the teaching faculty of the College of Education as well as surrounding secondary schools 	These comments are noted.
23	Mr. William Lillenberg	<ul style="list-style-type: none"> Concerned about the M3 zoning ordinance in the hillside area Redesignation for heavy industry on the District Plan would place heavy industrial classification adjoining two major parks in the area Amendment of the Plan would be contrary to the objectives of the District Plan to preserve and protect open space and park areas, park lands Designation of heavy industrial uses would set a bad precedent for this rural mountainous area and prejudice the future use of the 494 acres for compatible recreational open space or low intensity land uses when 	Refer to Topical Issues 15 and 24 and Final SEIR Responses 1274, 1280, 1623, 1624, and 1625 regarding the proposed General Plan Amendment/Zone Change. Also refer to Draft SEIR, Section 4.7, Land Use, p. 4-244 regarding consistency with the open space objective of the Granada Hills-Knollwood Community Plan.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> the landfill operation is concluded Amendment would undermine the future implementation of the District Plan To propose the change of zone from A1-1-O agriculture to M3-1-O heavy industrial use is an inappropriate classification at this location 	
24	Captain Terry Tamminen Santa Monica Baykeeper	<ul style="list-style-type: none"> Investigated the Sunshine Canyon Landfill with respect to its storm water pollution prevention plan, its plan was exemplary (creation and implementation) The stormwater quality below the facility will be identical to the stormwater quality above the facility Society needs facilities like Sunshine Canyon 	Comments noted.
25	Ms. Sophia Chiu	<ul style="list-style-type: none"> Do not grant the M3 zone Geology (e.g. slope stability, liner tearing, water contamination) 11,000 landslides in the Santa Susanas during the 1994 earthquake Active faulting in the vicinity of the site Slope stability issues onsite Calculations regarding determining the stability of the site could not have been complete, conclusions reached about geological stability in the absence of geological data California Department of Mines and Geology reported a huge landslide on dump property that was the largest slide produced by the '71 quake Researchers from U.S. Geological Service consider the Santa Susanas to be one of the most active landslide 	<p>Refer to Topical Issue 24 and Final SEIR Responses 1274, 1280, 1623, 1624, and 1625 regarding the proposed General Plan Amendment/Zone Change</p> <p>Also, refer to Topical Issues 1, 2, and 29 and Final SEIR Responses 6 and 744-749 regarding seismicity and slope stability; and Final SEIR Response 77 regarding the Jenson Filtration Plan.</p>

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> areas of the world • Cal State Northridge shows three small quakes; its epicenters were in Sunshine Canyon • Jenson Filtration Plant suffered extensive earthquake damage in '71 and '94 quakes. • Cannot assume it will be safe to operate the nation's largest landfill in a seismically active zone • Sunshine Canyon is located in an unstable location 	
26	Ms. Mary Ellen Crosby Friends of the Park	<ul style="list-style-type: none"> • Money was donated, none from BFI, several million from Quimby and from FEMA • Impacts to O'Melveny park from litter 	Refer to Topical Issue 15 regarding Land Use and Topical Issue 18 regarding litter control. Other comment noted regarding donation to park.
27	Mr. Sid Plaven	<ul style="list-style-type: none"> • Economic value of his home has increased, except during the earthquake • No problem in living close to the landfill 	These comments are noted.
28	Mr. Sherman Klein	<ul style="list-style-type: none"> • He has cancer due to the dump • SEIRs in area libraries differ 	Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding health issues; and Final SEIR Appendix B8 regarding library distribution.
29	Mr. Marcus Ortega	<ul style="list-style-type: none"> • Opposed to the landfill • After a rainfall black soot appears on car from landfill 	<p>This comment is noted.</p> <p>The comment regarding black soot on car is noted</p>
30	Mr. Carl Buratti	<ul style="list-style-type: none"> • Landfill expansion too close to MWD's open air water purification plant • Proposed location of the landfill is directly upstream of the Santa Ana wind flows, concerns over Santa Ana winds picking up and dispersing contaminants onto inhabitants and the purification plant downstream 	Refer to Topical Issue 3 and Final SEIR Responses 77, 78, 79, and 157 regarding high winds and contaminated particulates; and Topical Issue 15 regarding land use compatibility issues.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • Nothing to stop the landfill's windblown contaminants from being deposited directly into our drinking water • Granada Hills not a suitable place for a landfill; too close to homes, schools, parks, and the purification plant • Expansion to within 1,700 feet from a residential area is a gross error in judgment and will condemn the local community 	
31	Dr. Marshall Field	<ul style="list-style-type: none"> • In favor of the expansion, there would be a bigger problem in our desert region • Liner systems are equal, if not better, than the types of materials that they are placing on these landfills • Cannot afford to pay additional trash collection and disposal costs • Logical solution to our landfill shortage facing Los Angeles • BFI has helped community • BFI is a company that keeps people working in the community 	These comments are noted.
32	Ms. Sylvia Libis	<ul style="list-style-type: none"> • There has never been an unbiased health survey completed; that was a requirement • Individuals have come down with cancer in the area 	Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding health risk assessment.
33	Mr. Barry Klein	<ul style="list-style-type: none"> • The landfill is sited in an area with high winds, potential for the spread of pollutants, near O'Melveny Park, near a water treatment plant, and near an earthquake prone area 	Refer to Topical Issues 3 and 18 regarding high wind and litter control, Topical Issue 15 and Final SEIR Response 1433 regarding land use compatibility issues and O'Melveny Park, Final SEIR Response 157 regarding water treatment facilities, and Topical Issues 1, 2, and 29 regarding seismicity.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
34	Ms. Wanda Griffith	<ul style="list-style-type: none"> • Location of the landfill is in the wrong place • Diesel fuel emissions from truck traffic • Concern with pollutants and water filtration plant • Landfill is located in a geologic earthquake area 	Refer to Final SEIR Responses 895 and 923 regarding why Sunshine Canyon landfill is being considered for expansion, Topical Issue 25 regarding potential health risks from diesel fuel emissions, Final SEIR Response 157 regarding water treatment facilities, and Topical Issues 1, 2 and 29 regarding seismicity.
35	Ms. Dara Moss	<ul style="list-style-type: none"> • Doesn't want the expansion • Schools would be affected by air pollution • The environment (e.g., oak trees) and air will be harmed 	Refer to Topical Issues 25 and 27 and Final SEIR Response 254 regarding air quality and potential health effects and Topical Issue 11 regarding oak trees.
36	Mr. Royal Brown	<ul style="list-style-type: none"> • Need for an adequate buffer zone, a mile or two from the edge of the landfill footprint • BFI's record of safety must be refuted • BFI has been cited by the federal EPA as a responsible party for a large superfund site • Azusa Western (a BFI landfill) has a history of leachate discharge into the groundwater table • Health experts have documented the connection between odor complaints surrounding landfills with low birth weight for women who live near a landfill 	Refer to Topical Issues 22 and 24 regarding compatibility with residential uses and the General Plan Amendment/Zone Change, the Final SEIR Response 305 regarding landfill safety, and Topical Issues 4 and 25 regarding landfill gas generation and odor control and the need for a Health Risk Assessment.
37	Ms. Heather Moss	<ul style="list-style-type: none"> • Landfill expansion would be at the community's expense • Air, land, solitude, and health will be threatened • Property devaluation 	Refer to Topical Issues 3, 4 and 27 regarding air quality, Topical Issues 15 and 24 regarding land use, Topical Issue 15 regarding the need for a Health Risk Assessment and to the Final SEIR Response 180 regarding property devaluation.
38	Mr. Josh Jordal	<ul style="list-style-type: none"> • Opposed to the granting of an M3 zone • BFI not required to get an oak tree permit and arranged to have all the oak trees removed, so that they could avoid replanting • Removed oaks beyond their permanent boundary 	Refer to Topical Issue 24 regarding General Plan Amendment/Zone Change, and Topical Issue 11 and Final SEIR Response 1638 regarding oak trees, and Final SEIR Response 97 regarding the number of existing and proposed flare stations.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • BFI downplayed impacts on oak trees when proceeding within the County; few trees in the seedling or sapling size were noted in the field • Incinerators will be placed around the canyon • Number of oak trees that would be impacted by project development has been changed from the Draft to Final SEIR 	
39	Ms. Nicole Bott	<ul style="list-style-type: none"> • Oppose the expansion of the landfill • Health concerns regarding asthma • Differences in current standards of operation from the County vs. City • Size of the working face would increase from 5 to 10 acres • Proposed grade of the slopes will be steeper • Geologic concerns regarding faulting under the site • Long-term consequences resulting from steeper slopes • No additional inspectors will be hired • Replanted oaks will be monitored for 3 years as opposed to the County where they are monitored for 5 years • Final cover will only be 6 feet thick; replanting will be difficult • BFI plans to donate land on the County side for open space, once the landfill is closed; the use of the proposed expansion remains undetermined 	<p>Refer to Topical Issue 25 and Final SEIR Response 278 regarding potential health risks; Topical Issue 28 regarding working arrangement between the City and County, the Final SEIR Response 6 regarding slope stability; Topical Issues 1, 2, and 29 regarding seismicity and landfill operations; Topical Issue 11 regarding oak trees; Topical Issue 13 and Final SEIR Responses 205, 356 and 1296 regarding closure of existing inactive City Landfill and postclosure uses.</p> <p>Regarding the increased size of the working face and the lack of additional inspectors, hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill. In addition, it is anticipated that approximately 46 percent of waste will be received from transfer stations which is already presorted for hazardous and recyclable materials. Refer to Topical Issue 16 for further information on load checks for hazardous materials and other preventative measures incorporated into the Final SEIR.</p>
40	Ms. Rona Miller Berger (Speaking on behalf of	<ul style="list-style-type: none"> • Commented extensively on the air quality modeling presented in the Draft SEIR • Landfill gas emissions were underestimated 	Refer to Topical Issues 25 and 27 regarding health risk assessment and air quality revisions.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
	Stanley P. Sander)	<ul style="list-style-type: none"> • The SCREEN II model was too simplistic to handle the complex terrain • Essential input data was not included; impossible to determine whether the TAC emission rates used in the model are correct • The public has the right to know about the exposure rates for the rest of the community as well as school sites and the MWD facility • Health risk analysis and the Final SEIR is inadequate and needs more scrutiny by responsible agencies such as the SCAQMD 	
41	Mr. Donald Pierce	<ul style="list-style-type: none"> • Agreement for a park on the site of the closed landfill • Expansion plan would include the world's largest dump • The project would enlarge the County landfill and would also reopen the City portion (near residential uses) • The zone change would permit the acceptance of hazardous wastes • EIR reported that health risks cannot be mitigated • Debris will litter existing streets • Air quality will be degraded • Tranquility of the neighborhood will be jeopardized by refuse vehicles • Groundwater is at risk of being contaminated if the liner is breached • Homes will be devalued • Health risk posed to neighborhood and school children 	Refer to Final SEIR Responses 205 and 1296 regarding post closure recreational use; Topical Issue 22 regarding compatibility with residential uses; Topical Issue 24 regarding General Plan Amendment/Zone Change; Topical Issue 16 regarding hazardous materials; Topical Issue 25 and Responses 273 and 254 regarding potential health risks; Topical Issue 18 and Response 1433 regarding litter control; Topical Issue 27 regarding air quality; Topical Issue 20 regarding planned haul routes; Topical Issues 6 and 7 regarding groundwater protection measures; and Final SEIR Response 180 regarding devaluation of homes.
42	Ms. Susan Nelson	<ul style="list-style-type: none"> • Corporations (including BFI) are out of control 	This comment with respect to corporations is noted. Also, refer to

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
	Friends of the Santa Monica Mountains, Parks, and Seashore	<ul style="list-style-type: none"> Problems with diesel pollution being addressed by EPA No epidemiology studies conducted 	Topical Issues 25 regarding potential health risks associated with diesel emissions and the need for a Health Risk Assessment.
43	Mr. Stanley Plog	<ul style="list-style-type: none"> Diesel exhaust is more hazardous than indicated in the EIR More diesel exhaust is spewing out than projected in the EIR Liners leak (sharp objects, earth movement, earthquakes) Leakage from dump could enter water supply BFI cannot be trusted (e.g., past violations) 	Refer to Topical Issue 25 regarding potential health risks associated with diesel emissions; Topical Issues 8 and 29 regarding landfill liner design; Topical Issues 6 and 7 regarding groundwater protection measures; and Topical Issue 26 regarding past violations.
44	Mr. Jeff Goodman Granada Hills Youth Recreational Center	<ul style="list-style-type: none"> BFI is a supporter of Granada Hills Youth Recreation Center 	This comment is noted.
45	Mr. Elliot Fisch	<ul style="list-style-type: none"> So many issues regarding BFI; horrendously large record of their problems Cloud cover Methane gas problems Violated codes Suggests that BFI purchase homes and put in a park Political contributions to council members, politicians, and community groups 	<p>This comment is noted with respect to BFI.</p> <p>Also, refer to Topical Issue 4 regarding landfill gas generation and odor control; Topical Issue 26 and Final SEIR Response 182 regarding alleged code violations; and Topical Issue 30 regarding request for additional open space dedication.</p> <p>This comment is noted with respect to political contributions.</p>
46	Ms. Stevie Marie Dallas	<ul style="list-style-type: none"> Contempt for the environment, people they impact, and for regulators Pressure tactics used by BFI on regulators (e.g., flattery, premature commitments by staff, persuasion, undercutting a person's credibility, using intimidation, 	These comments are noted.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> spreading confusion, playing politics) • Asking for a level playing field 	
47	Mr. Mike Hurley AYSO Region 174	<ul style="list-style-type: none"> • Concerns over air particulate matter at the soccer field and water treatment facility • No complaints about smell from landfill in 13 years. • BFI is a good neighbor 	Refer to Topical Issue 3 and Final SEIR Responses 77, 78, 79, and 157 regarding high winds and contaminated particulates.
48	Ms. Esther Simmons Sunshine Canyon Advisory Committee	<ul style="list-style-type: none"> • BFI wants zone change, not variance • A zone change puts destructive power in hands of wrong people • A zone change creates an industrial-residential mixed zone • Low-level exposure from industrial uses is harmful • An M3 zone deteriorates the community • Sunshine Canyon's high winds, seismicity and history of fire danger make it a bad place for a dump • Should keep industrial and residential zoning separate to avoid potential disasters 	Refer to Topical Issue 24 and Final SEIR Responses 1274, 1280, 1623, 1624, and 1625 regarding the General Plan Amendment/Zone Change; Topical Issue 15 regarding land use compatibility; Topical Issue 3 regarding high winds and fugitive dust; Topical Issue 21 regarding fire prevention and control; and Topical Issues 1, 2, and 29 and Final SEIR Responses 6 and 744 through 749 regarding seismicity and slope stability.
49	Ms. Mary Edwards	<ul style="list-style-type: none"> • Operational impacts can't be felt until operations go to higher elevations • Sunshine Canyon is taking less than 6,000 tpd • BFI uncooperative towards citizens committee's requests for information • The nine inches of earth and daily cover is now a tarp held down with tires • BFI has ignored their permitting (accepting sewer sludge, delayed construction of incinerators.) • Workers can't identify toxic materials because of distance to floor of landfill 	<p>The comment is noted with respect to operational impacts. Refer to Final SEIR Response 339 regarding average tons per day in County landfill. The comment is noted with respect to BFI and community requests. Refer to Final SEIR Responses 84, 195 and 520 regarding Alternative Daily Cover Material; and Response 887 regarding the accepting of sewer sludge. As stated in Condition 10 (a) of the County Landfill's Conditional Use Permit sludge shall not be accepted. Comment noted regarding delayed construction of incinerators.</p> <p>Refer to Topical Issue 16 and Final SEIR Responses 222, 1248, and</p>

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
			1420 regarding identification and disposal of hazardous materials
50	Mr. Ernest Hill	<ul style="list-style-type: none"> • The existing flare is worse than an incinerator • What would happen to 80 acres • Trash generation amount per person disputed • BFI admits to emissions it cannot control 	<p>Refer to Topical Issue 4 regarding the LFG collection and flaring system.</p> <p>The comment regarding "80 acres" is apparently in reference to the ±80 acres of the existing inactive landfill proposed for development of the landfill footprint in the City. This area of proposed development has not changed.</p> <p>Regarding waste generation per person, Section 2-4 of the Draft SEIR bases the rate of 10.13 pounds per day on City figures for waste received at landfills in 1995 and State Department of Finance figures for City population in that same year. A Department of Public Works study prepared in 1993 estimated that each person in the City generates 7.1 pounds of waste per day.</p> <p>Refer to Final SEIR Response 169 regarding waste-to-energy facilities and Topical Issue 27, Responses 245 and 246 regarding air quality and project emissions.</p>
51	Mr. Don Mullally Santa Clarita Woodlands Park Committee	<ul style="list-style-type: none"> • BFI should provide public park in area of Coltrain Street guaranteeing public access to Weldon Motorway • BFI should also provide for the land between Mission Point and O'Melveny Park • BFI should acquire the headwater area of Rice Canyon Creek • If any gaps in ownership exist between East Canyon 	Refer to Topical Issue 30 and Final SEIR Response 1347, 1348, and 1644 regarding additional open space dedication.

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> Motorway and Bee Canyon, BFI should acquire to allow public access for recreational uses Access to above areas should be performed in a timely manner 	
52	Mr. Henry Pardo	<ul style="list-style-type: none"> No comments received 	No response
53	Mr. Bob Sutton Deputy Director of Planning - City of Los Angeles	<ul style="list-style-type: none"> Stated public hearing procedures 	No response
54	Ms. Alfreda Soriano	<ul style="list-style-type: none"> Truck traffic through residential neighborhoods is noisy, and leaves garbage Traffic and noise will increase Trucks are traveling up Balboa Blvd. when they are not supposed to be on this road Incidences of asthma occurring in kids has increased 	Refer to Topical Issues 20 regarding truck traffic, Topical Issue 18 regarding litter, Topical Issue 14 regarding noise, Topical Issue 25 and Responses 254 and 278 regarding potential health effects from landfill operations.
55	Ms. Janet Zumstein	<ul style="list-style-type: none"> Believes the high cancer rates in her neighborhood attributable to Sunshine Canyon Landfill 	Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding potential health effects from landfill operations.
56	Ms. Cynthia Cuan-Davies	<ul style="list-style-type: none"> Believes that the high cancer rates in area warrants a health survey 	Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding potential health effects from landfill operations.
57	Ms. Lynn Plambek Co-Chair LASER	<ul style="list-style-type: none"> No recycling facility at Sunshine Canyon Adequate landfill capacity in Los Angeles County PM₁₀ concern due to proximity of elementary school. 	Refer to Final SEIR Response 190 regarding recycling facility, Final SEIR Responses 891 and 943 regarding landfill capacity in Los Angeles County, Topical Issues 3 and 27 and Final SEIR Responses 254 and 257 regarding fugitive dust and PM ₁₀ emissions.
58	Mr. Frank Kortum	<ul style="list-style-type: none"> EIR is more confusing than previous EIR for the County expansion Landfill capacity calculated using 15 foot cover, instead 	<p>This comment is noted with respect to the EIR.</p> <p>The reference to 15-foot cover pertains to information in the April</p>

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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<p>of current 6 foot cover, so update needed</p> <ul style="list-style-type: none"> • Final SEIR contains changes made after comment period • Current EIR fails to consider alternatives (e.g., County expansion) • BFI's reduced volume alternative inadequate • Inadequate information about City/County agreement's content (who controls the monitoring process) • BFI should commit to preserving trees in upper canyon 	<p>1989 Draft EIR for the County landfill extension. This was proposed in some areas to support tree plantings. However, regulatory changes since that time require a geomembrane liner in the final cover which would be incompatible with tree plantings. The 6-foot cover is proposed for closure of the existing City landfill. Capacity calculations provided in the Draft SEIR were based on current cover, final cover and prescriptive liner requirements. It should be noted that current regulatory requirements for landfill liner systems are more stringent than prior design regulations.</p> <p>Refer to Final SEIR Section 2.1 regarding changes made in Final SEIR; Final SEIR Responses 168, 751, 752, 753, and 938 regarding selection of alternatives; Final SEIR Response 165 regarding the No Project Alternative incorporating County expansion; Final SEIR Response 910 regarding the Reduced Volume Alternative; Topical Issue 28 and Final SEIR Response 188 regarding the working arrangement between the City and County; Final SEIR Response 1638 regarding Oak Tree Mitigation.</p>
59	Mr. John Ulloth	<ul style="list-style-type: none"> • Landfill should not be located in a seismic area • Waste should be reduced and recycled 	Refer to Topical Responses 1, 2, and 29 and Final SEIR Responses 6 and 744 through 749 regarding seismicity and landfill stability; and Final SEIR Responses 895 and 943 regarding project need even with recycling.
60	Ms. Theresa Brady	<ul style="list-style-type: none"> • Plastic and toxic packaging should be eliminated • People have cancer from landfill • The landfill destroys habitat and pollutes water 	This comment is noted with respect to the elimination of plastic and toxic packaging. Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding potential health effects from

Table 2.3-1 (Cont.)
INDEX MATRIX OF COMMENTERS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
			landfill operations; Topical Issues 10 and 11 regarding biological resources; and Topical Issues 5,6, and 7 regarding water protection measures.

2.4 Responses to Written Comments Received during the Public Hearing (October 29, 1998)

Written comments were received during the public hearing held on October 29, 1998, and are summarized and responded to below. Copies of the entire written comments and attachments submitted are provided in Appendix E of this document. These commenters are numbered to correspond with the summarized comments and responses provided below. All written comments received will be forwarded to the City decisionmakers for their review and consideration.

Table 2.4-1
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
61	Mr. Tom McClintock Assemblyman 38 th District	Reference Commenter 3	Refer to Response 3
62	Mr. David Freeman, General Manager Los Angeles Department of Water and Power	<ul style="list-style-type: none"> • Expansion will bring the landfill within 1½ miles of the Los Angeles Reservoir Complex • Current operations have not posed a risk or degraded the quality of the LA Reservoir supply or the San Fernando Basin groundwater supply • Protective measures required by BFI have prevented leachate from entering the San Fernando Basin • The DWP will monitor closely to insure Federal and State requirements for the proposed project will protect water quality. 	Refer to Topical Issue 5 and Final SEIR Responses 157 and 535 regarding surface water quality protection measures and Topical Issues 6 and 7 for groundwater quality protection measures.
63	Mr. Hal Bernson Councilman 12 th District	Reference Commenter 1	Refer to Response 1
64	Ms. Barbara Casparian	Reference Commenter 7	Refer to Response 7
65	Mr. Patrick Casparian	Reference Commenter 8 In addition the following comments were submitted: <ul style="list-style-type: none"> • Based on the current Solid Waste Facilities Permit of 9,000 tons per day the maximum amount of approvals would be for 14,500 tpd. 	Refer to Response 8 In addition Refer to Final SEIR Responses 1 and 186 regarding average and peak daily waste intake rates; Topical Issue 27 regarding revised air quality data; Final SEIR Responses 30, 151, 154, 155, and 156 regarding consideration

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • Traffic calculations and air quality analysis do not reflect this larger amount • Traffic study is 5 years old • Current conditions show increased traffic on Balboa Boulevard and San Fernando Road • Traffic mitigation measures are inadequate 	of projected growth and current traffic conditions.
66	Mr. Robert Hertzberg Assemblyman, 40 th District	Reference Commenter 2	Refer to Response 2
67	Ms. Bonny Herman Valley Industry and Commerce Association	Reference Commenter 9	Refer to Response 9
68	Mr. Allan Cameron Comprehensive Development Consulting LASER	Reference Commenter 10 In addition the following comments were submitted: <ul style="list-style-type: none"> • Adverse effects of zone change on adjacent parkland and residential areas • Cumulative impacts that will result from future landfill expansions • Objects to project's siting near an elementary school • Reference to previous EIR prepared for County Landfill is cumbersome and information is old and inconsistent. • New EIR should be circulated 	Refer to Response 10 In addition refer to Topical Issues 15 and 24 regarding effect on residential areas and park from the proposed General Plan Amendment/Zone Change; Final SEIR Response 908 regarding cumulative impacts; Final SEIR Response 254 regarding potential health effects on elementary school children; Final SEIR Response 295 regarding volumes of documents; Final SEIR Responses 350 and 351 regarding incorporation of previous County EIR.
69	Mr. Wayne Hunter North Valley Coalition	Reference Commenter 19	Refer to Response 19
70	Dr. Sandra Klasky CSUN	Reference Commenter 22	Refer to Response 22
71	Howard and Peilien Wang	<ul style="list-style-type: none"> • Landfill affects property values and health. 	Refer to Topical Issue 22 and Final SEIR Response 180

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
	James and Jennie Wu	<ul style="list-style-type: none"> Dust from Sunshine Canyon will dirty the water. 	regarding property values being affected by the landfill; and Topical Issue 13 and Final SEIR Response 157 regarding water supply contamination and high wind conditions.
72	Mr. William Lillenberg	<p>Refer to Commenter 23. In addition the following comment was submitted:</p> <ul style="list-style-type: none"> A zone change will result in future intensification and permitted obnoxious land uses not envisioned in the Granada Hills-Knollwood Community Plan. 	Refer to Response 23.
73	Mr. Carl Buratti	Reference Commenter 30	Refer to Response 30
74	Ms. Sophia Chiu	<p>Reference Commenter 25</p> <p>In addition the following comment was submitted:</p> <ul style="list-style-type: none"> Lack of back up generators to vent methane gas in the event of an earthquake 	<p>Refer to Response 25</p> <p>In addition refer to Topical Issue 2 regarding performance of the landfill gas extraction system during the Northridge earthquake.</p>
75	Mr. Michael White	<ul style="list-style-type: none"> Airborne trash and contaminants present in neighborhood during Santa Ana wind conditions. Van Norman Dam also receptacle for wind blown trash. Supports the operation of the landfill. Does not support expansion of the landfill towards homes. Believes expansion on City property a decision based partly on the cost of tree replacement. The risk to the water supply affects a large portion of Los Angeles. Locating the expansion on County property creates a larger buffer for residences. Questions the logic behind preserving trees on County property over risks to human population. Residents should willingly bear the costs of expanding into 	Refer to Topical Issues 3 and 18 and Final SEIR Responses 77, 78, 79, 157, 287, and 288 regarding high wind conditions and contaminated particulates; Topical Issues 11 and 22 and Final SEIR Responses 1638 and 1644 regarding mitigation of oak trees and compatibility of the landfill with nearby residences; and Topical Issues 5, 6, 7, and 9 regarding groundwater and surface water quality control measures, and Final SEIR Response 165 regarding why expansion in the City portion of Sunshine Canyon is being pursued.

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		the County property instead of City property.	
76	Mr. Royal Brown	Reference Commenter 36 Left name/address for Hearing Examiner to obtain a copy of report referenced in Mr. Brown's testimony.	Refer to Response 36
77	Ms. Nicole Bott	Reference Commenter 39 In addition the following comments were submitted: <ul style="list-style-type: none"> • BFI would be responsible for supervising the load checks (concern with diligence and impartiality) • Concern that there are enough incinerators to destroy harmful toxins • There is no mention of sensors to detect levels of hazardous waste • There is no mention of sensors (lysimeters) for early detection of air and water contamination • There is no mention of interim revegetation for the proposed City Landfill expansion • There is no additional parkland to be donated as part of the proposed City Landfill expansion • The proposed elevation for the City Landfill expansion is 2,000 feet and will be visible from the valley • Daily cover is reduced from 9 inches at the County Landfill to 6 inches at the proposed City Landfill 	Refer to Response 39 In addition refer to Responses 203, 230, and 231 regarding the proposed load check program (including inspectors); Topical Issue 4 and Final SEIR Response 97 regarding the proposed landfill gas collection and flaring system; Topical Issue 16 regarding the proposed hazardous waste load checking program; Topical Issue 4 regarding monitoring of landfill gas; Topical Issue 7 regarding monitoring for groundwater protection; Topical Issue 3 regarding interim revegetation measures; Topical Issue 30 regarding additional park/open space dedication; Final SEIR Response 1515 regarding visibility of final elevations; Final SEIR Responses 84, 195, and 520 regarding reduction in daily cover requirement and use of alternative daily cover materials.
78	Mr. Stanley P. Sander	Reference Commenter 40 In addition the following comments were submitted: <ul style="list-style-type: none"> • The results for the toxic and carcinogenic emissions are not given in the SEIR • The model results for cancer risk give a worst-case 	Refer to Response 40 and Topical Issue 25.

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		exposure of only 4% below a significant level therefore uncertainty in the model and input data should have been presented in the Final SEIR	
79	Ann Ziliak	<ul style="list-style-type: none"> • Landfill will create hazards to all of L.A.s water supply. • Concerned about exposure to Vinyl Chloride, THM, and Chloroform from the landfill. • Why are Trihalomethanes not present throughout the landfill where water is used? • How will leaking and contamination be detected and confined? • Did rainfall data take into account El Nino predictions? • Were drainage improvements to prevent additional landslides into the creek bottom and constructed under a Categorical Exemption (due to predicted El Nino conditions) a violation of CEQA since improvements were done with no public input? • Disagrees that hydrogeologic connection between Sunshine Canyon and San Fernando Water Basin does not exist. • The alluvial soil beneath the existing inactive landfill must be removed. • What are the components of the surface water management system and how is this approved? • Should there be a requirement from the State to apply non-point source discharge regulations as well? • Does not agree with findings of Vadose zone monitoring report on County landfill that states the presence of Methane and VOCs are not caused by the landfill 	<p>Refer to Topical Issue 13 and Final SEIR Responses 77, 78, and 79 regarding high winds and the water supply contamination; Topical Issues 5, 6, and 7 regarding surface and groundwater protection measures; Topical Issues 16 and 25 and Final SEIR Response 316 regarding potential effects from toxic and hazardous materials.</p> <p>Refer to Final SEIR Responses 655, 657, 663, 666, 674.</p> <p>Refer to Topical Issues 7, 8, and 9 regarding design features to prevent groundwater contamination; Final SEIR Responses 540 and 536 regarding drainage design and El Nino conditions.</p> <p>Also, refer to Topical Issue 6 and Final SEIR Response 533 regarding the hydrogeological relationship between Sunshine Canyon and the San Fernando Water Basin.</p> <p>Topical Issue 15 and Final SEIR Responses 549 and 591 regarding NPDES Permit requirements for point source discharge.</p> <p>Refer to Topical Issue 7 and Final SEIR Responses 631, 965, 986, and 999 regarding groundwater protection measures including monitoring of the Vadose zone.</p>

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<p>operations.</p> <ul style="list-style-type: none"> • Concerned about accuracy of Vadose zone monitoring on closed City landfill. Probes should be installed every 100 feet since near residential area. • BFI is not a good neighbor. 	This comment is noted regarding BFI not a good neighbor.
80	Ms. Stevie Marie Dallas	<p>Reference Commenter 46</p> <p>In addition an article was submitted was submitted by Larry Kolb of the San Francisco Regional Water Quality Control Board regarding pressure tactics used for landfill siting.</p>	Refer to Response 46
81	Ms. Gloria Pitt	<ul style="list-style-type: none"> • Opposed to general plan amendment and zone change. • Additional water, mud, or debris can't be contained in existing drainage channels. 	<p>This comment is noted regarding opposition to the general plan amendment and the zone change.</p> <p>Refer to Topical Issue 5 regarding stormwater runoff control measures.</p>
82	Ms. Kathy Buratti	<ul style="list-style-type: none"> • Concerned with landfill expansion adjacent to Granada Hills. • Concerned with particulate matter contaminating the water treatment facility. • The dump will pose a serious health threat for young, elderly and people with respiratory problems. • Property values will suffer due to the dump. • Granada Hills (a residential community) is no longer a suitable place for a dump. • Expanding the dump increases risk of cancer and other serious health problems. • The dump's expansion up to 1,700 feet from nearest residence is unacceptable. 	Refer to Topical Issues 15 and 22 regarding compatibility with adjacent land uses; Topical Issue 3 and Final SEIR Responses 77 through 79 and 157 regarding high winds and contaminated particulates; Topical Issue 25 and Final SEIR Responses 254, 278, and 316 regarding potential health effects and the need for a health risk assessment; and Final SEIR Response 180 regarding property devaluation.

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> A health impact report needs to be conducted. 	
83	Unknown	<p>Refer to Commenter 58. In addition the following comments were provided:</p> <ul style="list-style-type: none"> Landfill cover soil reduction (from 15 feet to 6 feet) would provide less protection from air and water pollution. Residents were given only 30 days to comment on this expansion instead of the 90 days requested by Council Member Bernson. 	<p>Refer to Response 58. In addition the following responses are provided:</p> <p>Refer to Final SEIR, Section 1.2 regarding document noticing and review period for the Draft SEIR. In addition the review period for the Final SEIR was in compliance with CEQA Guidelines §15089.</p>
84	Ms. Susan Nelson Friends of the Santa Monica Mountains, Parks, and Seashore	Reference Commenter 42	Refer to Response 42
85	Unknown	Copy of lawsuit filed by NVC vs. County of Los Angeles in 1991 (Case No. BC 024160) and letter from Mary Edwards, North Valley Coalition, to Con Howe, Director of City Planning Department, dated October 30, 1997.	This comment is noted.
86	Ms. Laura Simonek Principal Environmental Specialist Metropolitan Water District of Southern California	<ul style="list-style-type: none"> Concerned about the containment of leachate and gas and potential effects on the Jensen Filtration Plant and the Balboa Inlet Tunnel. Request that all plans be submitted to MWD for written approval. Expect that the applicant take necessary precautions to ensure activities don't preclude use of MWD's 56-acre parcel adjacent to southeast corner of project site. 	<p>Refer to Topical Issue 9 and Final SEIR Responses 77 through 79 regarding leachate generation, collection, and treatment; Topical Issue 4 regarding containment of landfill gas; and Final SEIR Response 78 regarding submittal of plans to MWD for approval.</p> <p>This comment is noted with respect to MWD's 56-acre parcel.</p>

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
87	Howard and Peilien Wang James and Jennie Wu	See above, same letter as Commenter 71	Refer to Response 71
88	Mr. Juan Semczuk	<ul style="list-style-type: none"> • Opposed to expansion of landfill. • Breathing polluted air full of toxic waste and hazardous materials • Stop suffering, allergies, contamination, etc. 	<p>This comment is noted with respect to opposition.</p> <p>Refer to Topical Issues 25 and 27 regarding health risks and air quality; Final SEIR Response 183 regarding impacts of historic operations on surrounding community; Final SEIR Responses 77 and 157 regarding impacts on water treatment facilities; and Topical Issue 3 regarding control of fugitive dust emissions during high wind conditions.</p>
89	Ms. Veronica Semczuk	See above, same as Commenter 88	Refer to Response 88
90	Ms. Chistine Flygenring	See above, same as Commenter 88	Refer to Response 88
91	Mr. Hugo Halcovich	See above, same as Commenter 88	Refer to Response 88
92	Ms. Barbara Halcovich	See above, same as Commenter 88	Refer to Response 88
93	Ms. Dalila Azul Semczuk	See above, same as Commenter 88	Refer to Response 88
94	Ms. Maria Semczuk	See above, same as Commenter 88	Refer to Response 88
95	Mr. Victor Ayala	See above, same as Commenter 88	Refer to Response 88
96	Mr. A. Toczynski	See above, same as Commenter 88	Refer to Response 88
97	Ms. Jennie McNamara	See above, same as Commenter 88	Refer to Response 88
98	Mr. Robert Ricketts	<ul style="list-style-type: none"> • A combination of earthquake or flooding could release toxic/hazardous waste into the Van Norman Reservoir and public drinking water. • It is quite probable that airborne dust from the toxic 	Refer to Topical Issues 5, 6, 7, and 29 regarding groundwater and surface water protection measures; Topical Issue 3 and Final SEIR Responses 77, 78, 79, and 157 regarding high winds and contaminated particulates; and Topical Issue 16

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		materials will be carried to the lake. • Regulating what materials will be dumped is extremely difficult to monitor. • Please give serious attention to the inherent threats of the natural conditions in this unique environment.	regarding hazardous materials monitoring. This comment is noted with respect to existing natural conditions.
99	Stephan and Vera Bagboudarian	• Strongly oppose changes that BFI is requesting. • Property values have declined since reopening the landfill in Sunshine Canyon. • The Zone Change will further damage investment and may cause health hazards. • Will seek any and all remedies should the landfill be expanded and should the family suffer from health problems attributed to the landfill operations.	This comment is noted with respect to BFI request. Refer to Final SEIR Response 180 regarding property values, Topical Issue 25 and Final SEIR Responses 183 and 184 regarding health hazards. With respect to remedies, this comment is noted.
100	Richard and Barbara Dreyfus	• Protest and oppose the expansion of Sunshine Canyon Landfill and deny the request for a Zone Change.	This comment is noted.
101	Deborah Dreyfus	• Opposes the expansion of Sunshine Canyon Landfill.	This comment is noted.
102	Unknown	• Westlaw Information pertaining to toxic torts and emotional distress, environmental justice, stigma and property contamination, waste facility siting, and US hazardous waste disposal policy.	These comments are noted.
103	Unknown	• The SEIR verifies Councilman Hal Bernson's objections to the landfill because it spells out risks to the health and welfare of people living in Los Angeles. • The landfill puts the water supply at risk because it is close to the aqueduct and Jensen Treatment Plant. • The landfill would be located in an active earthquake area.	Refer to Topical Issue 25 and Final SEIR Response 183 and 184 regarding health hazards; Topical Issues 5, 6, and 7 regarding groundwater and surface water protection measures; Topical Issues 1,2, and 29 regarding landfill performance during an earthquake; Topical Issue 26 regarding past violations at the previously operating City

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • City Zoning Administrator John Parker concluded that the landfill is in a poor location due to strong winds and referenced past violations. • Traffic is severely impacted in the area surrounding the landfill and additional traffic from the zone change cannot be mitigated. • LAUSD has expressed its concern about negative air quality impacts on local schools. • Mitigation measures suggested by the LAUSD would be costly to install, maintain and monitor. • One of the problems leading to Zone Revocation hearings in 1988 was trash and dust blowing into neighborhood homes and water supply. • The probability of wind blown contamination from the landfill to the Jensen Filtration Plant and the Los Angeles Reservoir will increase if the landfill is allowed to expand. 	Landfill; Topical Issues 19 and 20 regarding traffic; Topical Issues 3 and 27 and Final SEIR Responses 254, 255, and 257 regarding air quality impacts; Topical Issue 18 regarding litter control; Topical Issue 3 and Final SEIR Responses 77, 78, 79 and 157 regarding high winds and contaminated particulates.
104	Unknown	<ul style="list-style-type: none"> • Westlaw information pertaining to guidelines for landfill gas emissions, municipal liability under CERCLA, and RCRA's clarification of hazardous waste. 	This information is noted.
105	D. Hall	<ul style="list-style-type: none"> • The request to amend the Granada Hills-Knollwood Community Plan would be disastrous for L.A. due to proximity of water supply, schools, homes and wildlife. • The impact of the landfill will be harmful to the neighborhood and surrounding areas. 	Refer to Topical Issues 3,5, and 7 regarding groundwater and surface water protection measures; Final SEIR Response 254 regarding impacts on school children; Topical Issues 22 and 24 regarding compatibility with residential uses; and Topical Issue 10 regarding sensitive biological habitats.
106	Ms. Corinne Sanchez, Esq. President-Chief Executive Officer	<ul style="list-style-type: none"> • Impressed with the operation at Sunshine Canyon. • Sunshine Canyon Landfill is necessary to hold down disposal costs and provide jobs. 	These comments are noted.

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
	El Proyecto del Barrio, Inc.	<ul style="list-style-type: none"> BFI has proven their commitment to the protection of the environment and demonstrated that they are a safe and responsible operator. The landfill proposal is a clean, safe and logical continuation of an existing landfill and will allow our community to manage long-term disposal needs. 	
107	Ms. Gloria Pitt	Letter from County Supervisor Mike Antonovich (dated October 18, 1993) stating opposition to County Landfill expansion.	The correspondence is noted.
108	Unknown	<ul style="list-style-type: none"> If Sunshine Canyon expansion is approved it will put at risk the water supply of Los Angeles City and County. City Council should contact the Disaster Preparedness Division regarding the landfill expansion adjacent to a water treatment facility. Families have sold their homes below market value due to health problems. The majority of citizens are ignorant of the existence of the landfill and the City intends for Sunshine Canyon Landfill to be the only landfill serving all of Los Angeles and its neighboring communities into the future. Sunshine is located in the wrong place in an earthquake area and adjacent to the aqueduct and water treatment facility. The entire area around the aqueduct and water treatment facility should be protected against any conceivable risk for the indefinite future. Santa Ana winds cause an air pollution risk to Los Angeles. 	<p>Refer to Topical Issues 5 and 6 regarding risk to water supply.</p> <p>Refer to Topical Issues 1, 2, and 29 and Final SEIR Responses 6 and 744 through 749 regarding seismicity and slope stability, Topical Issues 5 and 6 regarding risk to water supply, Final SEIR Response 305 for a discussion of alleged violations at other BFI landfills and BFI's corporate environmental health and safety policies, and Topical Issue 25 and Final SEIR Response 183 and 184 regarding health hazards.</p> <p>Other comments regarding BFI are noted.</p>

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • BFI was the subject of a TV investigation in New York alleging manipulation of politicians. • BFI has given \$1 Million to various Los Angeles organizations to "buy their way into political and service agencies." • BFI admitted discharging contaminated waste water into the District of Columbia sewer system and agreed to pay \$1.5 million in fines. • Sunshine Landfill will affect the quality of life, health and welfare of the entire Los Angeles region 	
109	Ms. Wanda Griffith	<ul style="list-style-type: none"> • The City has started closing all other landfills and Sunshine Canyon Landfill is projected to be the only landfill to handle solid waste for the Los Angeles region and adjacent counties into the future. • The landfill has caused health problems in the O'Melveny and Bee Canyon areas. • The trucks entering the landfill will cause carcinogenic diesel fuel emissions above Los Angeles. • The landfill will be a constant source of contamination for the aqueduct and water treatment plants. • The Sunshine Canyon Landfill is in the heart of earthquake faults. • The SEIR and Final SEIR projected the impact the landfill's pollution will make on the health of students attending Frost Middle, El Oro Way, and Van Gogh Elementary Schools. The mitigation measures are too costly to install and monitor. • Since the last standing grove of oak trees were cut down in 	<p>Refer to Topical Issue 25 and Final SEIR Response 183 and 184 regarding health hazards, Topical Issue 27 regarding diesel fuel emissions, Topical Issues 5 and 6 regarding risk to water supply, Topical Issues 1, 2 and 29 and Final SEIR Responses 6 and 744 through 749 regarding seismicity and slope stability, Topical Issues 3 and 27 and Final SEIR Responses 254, 255, and 257 regarding air quality and health risk impacts, and Topical Issue 11 regarding oak trees and Final SEIR Topical Issue 17 regarding vector prevention and control.</p> <p>Refer to Final SEIR, Section 1.2 regarding Draft SEIR review period and noticing and Section 1.4 of this document for notification of the proposed General Plan Amendment Zone Change.</p> <p>Other comments regarding Lopez Canyon, County Landfill</p>

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<p>the County, large flocks of crows are now harassing the neighborhood.</p> <ul style="list-style-type: none"> • Realtors omit verbal mention of the landfill to prospective buyers. • Most everyone in the Valley and Granada Hills are unaware of this permit request. • People in the Sanitation Department were dismayed when Lopez Canyon was closed. • Conclusion is that the Board of Supervisors agreed to expand the landfill in County land regardless of the impact it would have on the environment. • If this permit is approved, legal fees will cost tax payers far more than the lower trash fees BFI charges the City. 	expansion, and legal fees are noted.
110	Petition to Stop the Expansion of Sunshine Canyon	<ul style="list-style-type: none"> • Opposed to the proposed expansion of the Sunshine Canyon Landfill • Development will significantly increase health risks and affect property values 	<p>This comment is noted with respect to opposition of the expansion.</p> <p>Refer to Topical Issue 25 and Final SEIR Responses 183 and 184 regarding health hazards and Final SEIR Response 180 regarding property values.</p>
111	Mr. Bill Piazza Environmental Assessment Coordinator LAUSD	Reference Commenter 6	Refer to Response 6.
112	North Valley Coalition	Unofficial Notice of Public Hearing	This notice is noted.
113	Mr. Robert B. Lamishaw President Elect Mid-Valley Chamber of	<p>Refer to Commenter 11. In addition the following comment is provided:</p> <ul style="list-style-type: none"> • The only practical alternative is to haul thousands of tons 	Refer to Response 11.

Table 2.4-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES FROM THE
SUNSHINE CANYON PUBLIC HEARING (October 29, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
	Commerce	of trash to remote desert locations resulting in adverse environmental impacts, potential for spillage and accident, and substantial extra costs.	
114	Unknown	<ul style="list-style-type: none"> • How can City justify costs of trash trucks from the west side traveling to Granada Hills when there is a developed or designated landfill off the west side of the 405 freeway? • How will City insure residents who live near the dump from future medical illnesses as well as private and public nuisance complaints? • Smell is already perceived in O'Melveny Park. • BFI has used tractors and earthmovers at night during the last 3 months to develop certain areas . • A sacrifice of one child's health does not justify Granada Hills subsidizing the rest of the City's low cost economic use of Sunshine Landfill. • How can City reconcile granting wildlife status to Santa Monica Conservancy near Woodland Hills and not expand/explore landfill there not anywhere near homes and yet possibly approve Sunshine expansion close to homes. 	<p>It is not known what proposed or pending landfill site the commenter is referring to nor is this designated in City and County Solid Waste Management Plans reviewed during the preparation of the Draft and Final SEIR.</p> <p>Refer to Draft SEIR, Section 2.12, Proposed Hours of Operation. Due to daylight savings time some operations occur after daylight hours.</p> <p>Refer to Topical Issue 22 regarding the distance, topography, and natural areas that separates the proposed project from residential uses.</p>
115	Mr. Bryan Davis	<ul style="list-style-type: none"> • Danger caused by seeping garbage into our water system, pollution from thousands of 18-wheelers which will affect the children attending elementary schools in the area, and the awful stink from prevailing winds. • There are areas around the Antelope Valley which are unoccupied and better suited for a dump. • Vote this measure down 	Refer to Topical Issues 6, 7, and 9 regarding groundwater protection measures; Final SEIR Response 254 regarding impact on school children; Topical Issue 4 regarding odor control measures; and Draft SEIR, Section 5.10 regarding the analysis for remote landfill alternatives.

2.5 Responses to Written Comments Received after the Close of the Public Hearing October 30 through December 3, 1998.

Written comments were received by City staff following the close of the public hearing until December 3, 1998. The commenters were numbered to correspond with the summarized comments and responses provided below. Complete copies of these comments and other information submitted are provided in Appendix G of this document. All written comments received will be forwarded to the City decisionmakers for their review and consideration.

**Table 2.5-1
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
SUNSHINE CANYON PUBLIC HEARING (October 30 through December 3, 1998)**

Commenter No.	Name of Commenter	Issue(s)	Reference Response
116	Ms. Jill Klajic, Councilwoman City of Santa Clarita	Reference Commenter 4, Table 2.3-1 in this document	Refer to Response 4, Table 2.3-1 in this document.
117	Ms. Susan Siskin	<ul style="list-style-type: none"> • Opposed to the reopening and expanding of the Sunshine Canyon Landfill • There is a better way to deal with Los Angeles' garbage 	These comments are noted
118	Mr. Ernest Hilberg	<ul style="list-style-type: none"> • Opposed to the burning of gases at Sunshine Canyon. • Believes Ventura County will use Sunshine Canyon Landfill. • If city enforces recycling, landfill use will drop. 	Refer to Final SEIR Topical Response 4 and Final SEIR Response 1214 regarding gas-flaring system operation and capacity. The comments regarding Ventura County and recycling are noted.
119	Ms. Margaret S. Vernallis	<ul style="list-style-type: none"> • Believes public participation was inadequate. • Before 1991, landfill refuse would dot the hills. • The landfill expansion will prevent a network of hiking trails to be developed. 	Approximately 8,700 owners/occupants located within a 2-mile radius of the landfill site were sent notices of the Public Hearing in addition to ads placed in several area newspapers. Refer to Section 1.4 of this document for further discussion of public notification. Refer to Final SEIR Response 1274 for the compatibility of the landfill expansion with the open space and conservation goals of neighboring community plans. Refer to Topical Response 18 regarding litter control.

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
SUNSHINE CANYON PUBLIC HEARING (October 30 through December 3, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
120	Mr. Nicholas B. Kurek	<ul style="list-style-type: none"> • Opposes the landfill expansion. • Believes the landfill jeopardizes Van Norman Lake. • Odors from dump will become worse with expansion. • Property values will drop due to the expansion. • Traffic will get much worse. 	Refer to Topical Response 9 and Final SEIR Responses 83, 357 and 533 regarding water control measures and existing water quality in the area near Sunshine Canyon. Refer to Responses 26 and 30 regarding circulation forecasts and traffic counts.
121	Ms. Ruth Braxdale	<ul style="list-style-type: none"> • Opposed to landfill in neighborhood. • Believes cancer-related deaths in neighborhood attributable to landfill. • The winds blow debris over the homes. • Ship trash to the desert where there is no population. 	Refer to Topical Response 25 and Final SEIR Response 316 regarding the performance of a health risk assessment and potential for chronic or acute health risks. Refer to Final SEIR Response 938 regarding feasibility of out-of-county disposal. Refer to Final SEIR Topical Response 3 and Response 499 regarding fugitive dust emissions and trash during high wind incidents.
122	Mr. Gerald Simmons	<ul style="list-style-type: none"> • Has not seen evidence supporting need for expansion. • Does not feel that preserving trees on county property over expanding closer to residences is the answer. • Believes expansion is driven by cost savings. • With a zone change, BFI can conduct whatever business they feel like. • Placing industrial zones near residences is dangerous. 	Refer to Section 2.3 of the Draft SEIR regarding need for expansion. Refer to Topical Response 11 regarding Oak and Douglas Fir trees. The comment regarding cost savings of expansion is noted. Refer to Final SEIR Topical Response 24 and Response 1623 regarding the need for a zone change instead of a variance and zoning conditions that can be incorporated to prohibit incompatible industrial uses. Refer to Final SEIR Response 1644 regarding the dedication of Bee Canyon by BFI for recreational purposes.
123	Mr. Joseph Borrego	<ul style="list-style-type: none"> • Opposed to the landfill expansion. 	This comment is noted.
124	Thomas and Jane Bristol	<ul style="list-style-type: none"> • Odors from landfill expansion will ruin neighborhood. • Encourage relocation of landfill to prevent property devaluation. 	Refer to Final SEIR Topical Response 4 and Responses 73 and 101 regarding odor control measures and their historical effectiveness. Refer to Final SEIR Response 180 regarding the affects of proposed project on property values.
125	Ms. Sheila Moss	<ul style="list-style-type: none"> • Protesting the landfill expansion. 	Refer to Final SEIR Responses 254, 255 and 256 regarding

Table 2.5-1 (Cont.)
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SUNSHINE CANYON PUBLIC HEARING (October 30 through December 3, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • Toxic fumes are not healthy. • The DWP's water supply is only 1/2 mile away. • The cutting of trees is not environmentally sound. • Does not want Sunshine Canyon to be known as the biggest landfill. 	potential health implications from air quality. Refer to Topical Responses 7,9 and Final SEIR Responses 77-79 regarding groundwater protection and DWP water supply. Refer to Topical Response 11 regarding trees.
126	Michael and Dora Prihar	<ul style="list-style-type: none"> • Believes BFI is creating a toxic dump at Sunshine Canyon. • In the 1980's, winds would blow trash, odors, and filth through the neighborhood. 	Refer to Final SEIR Responses 1420, 1418, 1419, 1013, 887, and 222 regarding the potential of introducing prohibited wastes into the landfill. Refer to Topical Response 18 regarding litter control. Refer to Final SEIR Response 182 regarding compliance record of previous City Landfill operation.
127	Mr. Don Mullally	<ul style="list-style-type: none"> • Reference Commenter 51 	Refer to Response 51.
128	Mr. Rod Barlog	<ul style="list-style-type: none"> • Opposed to landfill expansion. • Air and water pollution will be a threat if expansion is approved. • Increased traffic through neighborhood. • Diesel exhaust is known carcinogen. • BFI cannot guarantee against water contamination 	This comment is noted with respect to opposition. Refer to Topical Issues 5 and 7 regarding water quality protection measures; Topical Issue 20 regarding truck haul routes; Final SEIR Response 156 for traffic/ circulation analysis; Topical Issue 25 regarding diesel exhaust as a carcinogen.
129	Mr. Gary Schnittgrund	<ul style="list-style-type: none"> • Strongly opposed to zoning change • Proposal will thwart development of alternative disposal methods. • Unsafe to place landfill at site of earthquake fault. • The landfill and the trucks that service it will affect the health of the nearby citizens 	This comment is noted with respect to opposition. Refer to Topical Issues 1 and 2 regarding seismicity and landfill performance during the Northridge quake; Final SEIR Response 169 regarding analysis of alternative disposal methods; Responses 316, 256, and 254 regarding health risks associated with the landfill and haul trucks.
130	Ms. Sonia K. Aller, Ph.D.	<ul style="list-style-type: none"> • The expansion will create one of the largest landfills in the U.S. • Methane can be smelled on some days, is a health risk, and 	Refer to Final SEIR Responses 1 and 186 regarding project operation; Responses 162 regarding the effectiveness of odor control measures; Final SEIR Responses 73 and 101

Table 2.5-1 (Cont.)
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> cannot be 100% contained. • Diesel trucks will increase to over 1200 daily. • Diesel exhaust has recently been declared a carcinogen. • Diesel trucks emit more than 30 times more than that of a diesel car. • The hearing on Oct. 29 was unfair; people's speaking times were reduced to one minute from three minutes. • The City should be concerned with law suits arising from cancer caused by diesel pollutants and methane. • The proposed expansion is one mile from, and above the city's major source of treated water. • There are three earthquake faults close to the site which could rupture the lining. 	<p>regarding measures to be implemented at the proposed landfill; Final SEIR Response 70 regarding air quality health risk analysis; Topical Issue 25 regarding diesel fuel as a carcinogen.</p> <p>The comment is noted with respect to the hearing on October 29. Refer to Topical Issue 29 regarding the liner's ability to withstand earthquakes. Refer to Topical Issues 5 and 7 regarding water quality protection measures.</p>
131	Mr. Wayne K. Aller	• Refer to Commenter 130	Refer to Final SEIR Response 130
132	Mr. Wayne Tsuda City of Los Angeles Local Enforcement Agency	<ul style="list-style-type: none"> • Regulatory agencies may not have the ability to survey and enforce mitigation measures, some of which go beyond the minimum requirements of an agency's authority, or require special expertise. • Recommend that a third party mitigation monitoring program be considered and that reports could be issued to the Planning Department to provide an overall assessment of compliance with mitigation. • The City LEA does not agree to a Joint Powers Agreement, opting to fully cooperate with the County LEA and other regulatory agencies. • The City's Solid Waste Facility Permit will not necessarily be identical to the County permit. • The City LEA inspectors will not check waste loads, but 	Refer to Final SEIR Response 336 regarding monitoring agencies' jurisdiction and responsibilities and Topical Issue 28 regarding a working arrangement between the City and County. The comments regarding monitoring, the exercise of joint powers, the Solid Waste Facility permit's conditions, the role of LEA inspectors in enforcing permit conditions, and the depiction of the waste on waste liner are noted. The decision-makers will ultimately determine the extent and form of any joint agreement. In addition, the issue of LEA inspector requirements was addressed in Final SEIR Response 203 and incorporated into Section 2.0 of the FSEIR. The comment is noted regarding third party monitoring by an outside consultant. The additional control measures suggested for controlling the potential odors generated by use of stockpiled

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
SUNSHINE CANYON PUBLIC HEARING (October 30 through December 3, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<p>enforce permit conditions and verify that required load checks have been completed.</p> <ul style="list-style-type: none"> • Would like the proponent to explore additional options for controlling odors, particularly on-site storage of green waste. • Elimination of the drop-off buyback center periodic application of cover materials from project description was not the intent of the LEA. • Section 2.7.3 has technical inconsistencies with respect to the liner system's description. 	<p>green waste will be considered if green waste is proposed as an alternative daily cover (ADC), in place of the tarps which have been approved for and in use at the County Landfill Extension. The use of green waste as an ADC would require conditional regulatory approval prior to implementation. The drop-off/buyback center and periodic application of cover materials were not eliminated by the applicant in response to LEA's comments. Revisions to Figure 2.7-3 and a discussion of the waste on waste liner system are included in FSEIR Responses 198, 199, and 201 and in Section 2.0.</p>
133	Ms. Ellen Bendiksen	<ul style="list-style-type: none"> • Afraid LA aqueduct will be poisoned by landfill. • The health and water issues affect not just Granada Hills, but all of Los Angeles. • Do not reward a company that has not operated within its permitted uses. 	<p>These comments are noted with respect to safety issues; Refer to Final SEIR Response 305 regarding BFI's past history at Sunshine Canyon and other landfills, and its company policies. Refer to Topical Issues 5 and 7 regarding water quality protection measures. Refer to Topical Response 26 regarding alleged Zoning violations.</p>
134	Mrs. Susan Parks	<ul style="list-style-type: none"> • The expansion is one-half mile from residences and O'Melveny Park. • The 1994 earthquake's epicenter was nearby and completely destroyed a nearby school. • Winds will carry trash into the neighborhood. • Diesel fumes from trucks will pollute the air. • The only time she felt well was when the dump was closed. 	<p>These comments are noted with respect to the expansion and seismic damage from the 1994 earthquake. Refer to Topical Issue 18 regarding litter control; Topical Issue 25 regarding perceived health effects experienced by the neighborhood.</p>
135	Ms. Sharon Stenen	<ul style="list-style-type: none"> • Opposed to the landfill expansion. 	<p>This comment is noted</p>
136	Ms. Adina Kay	<ul style="list-style-type: none"> • Objects to the following: the zone change, the landfill expansion, the proximity of the landfill to neighborhoods, 	<p>The comment is noted regarding the location of the public hearing.</p>

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<p>the potential for methane gas to migrate off-site, potential for water contamination, the number of trucks (1200) that will enter her neighborhood, the presence of garbage trucks at McDonalds on Balboa Blvd.</p> <ul style="list-style-type: none"> • Appreciates having the meeting at Kennedy High. • Requests reason for comments in favor of the dump. • Requests information regarding correspondence from BFI to Chambers of Commerce. • Requests name of individual who died at Public Forum, Oct. 29, 1998. • Would annexation of San Fernando from Los Angeles have an effect on decision-making process. • Questions rights of non-residents to make local decision. • What is siting criteria. • Believes BFI and City should be held liable for potential health risks. • BFI should purchase residential properties, and be forced to pay medical expenses of those people affected by the landfill. • Home values will depreciate. 	Refer to Topical Issue 15, regarding Land Use; Draft SEIR, Section 2.6.1, regarding landfill siting criteria; and Topical Issue 25 regarding health risk assessment
137	Mr and Mrs. Harold Unger	<ul style="list-style-type: none"> • Protest the zoning change • People have suffered health hazards from the landfill for many years. • 200 acres of the landfill are close to schools, parks, congregation areas and residences. • Methane containment not 100%, especially during an earthquake • 1200 Diesel trucks will enter neighborhood • Diesel is a carcinogen 	Refer to Topical Issue 24 regarding the General Plan Amendment/ Zone change; Topical Issue 25 regarding the performance of a Health Risk Assessment on the local residents; Topical Issue 4 regarding methane gas containment; Topical Issue 20 regarding planned haul routes for trucks. This comment is noted with respect to the environment.

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
SUNSHINE CANYON PUBLIC HEARING (October 30 through December 3, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • The environment must be preserved 	
138	Mr. Scott Robinson	<ul style="list-style-type: none"> • Opposed to zoning change • Concerned about landfill affecting residents health and property values • 200 acres of landfill are close to residential property • Methane containment not 100% • Potential for air and water contamination, especially during an earthquake • Number of trucks entering neighborhood a health hazard, because of diesel and presence of people • Believes landfill should be located at a more receptive location. 	This comment is noted with respect to the zoning change. Refer to Topical Issue 22 regarding the compatibility of the landfill with residential uses; Topical Issue 4 regarding methane gas containment; Topical Issue 29 regarding the performance of the liner system during earthquakes; Topical Issue 20 regarding truck routes; Final SEIR Responses 1371 and 942-943 regarding the City's solid waste disposal needs and the feasibility of alternative sites.
139	Ms. Marilyn Galins	<ul style="list-style-type: none"> • Opposed to the zone change • Open space should be protected and preserved • Opposes any official who endorses Sunshine Canyon 	Refer to Final SEIR Responses 1347 and 1348 regarding BFI's purchase of acreage in Bee Canyon to be dedicated to recreational use and wildlife preservation. These comments are noted with respect to the zone change and public official endorsement.
140	Mr. Robert Smith	<ul style="list-style-type: none"> • Objects to the zoning • Landfill could contaminate water processing plant • Seismic activity could cause landfill to leak • 1200 carcinogenic diesel trucks will drive through neighborhood • What about rail system for disposing trash in desert 	This comment is noted with respect to zoning. Refer to Topical Issue 9 regarding leachate collection; Topical Issue 20 regarding haul routes of garbage collection trucks; Topical Issue 29 regarding the liner's ability to withstand earthquakes; and Final SEIR Response 893 regarding the waste-by-rail alternative.
141	Mr. George Kane	<ul style="list-style-type: none"> • Believes Planning Department is apathetic to situation • Feels the EIR was flippant in addressing comments and a waste of time and money • Many health hazards (e.g. diesel fumes, polluted air and 	This comment is noted with regard to the Planning Department's apathy. Refer to Final SEIR Responses 875 and 876 regarding consultant objectivity; and Topical Issue 25 regarding the performance of a health risk assessment in the

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		water, methane gas) in neighborhood	neighborhood.
142	Ms. Rebecca Bendikson	<ul style="list-style-type: none"> • What is mitigation for the number of diesel trucks. • How is water contamination to be prevented • There is seismic activity in the area that could cause water contamination • Will a full-time inspector be required to serve only the City side and who would pay for them. • Does not trust public officials in regard to dump closure and would like to know when it will be closed and what will be done with the land. • Wants to know amount of campaign contributions BFI has made to City decision makers. • Concerned with controlling dust from landfill at surrounding areas and at what wind speed would operations cease. • How many agency violations (e.g. OSHA, AQMD) has BFI been accused of in the past. • Concerned about human health effects from methane gas, air and water pollution. • Concerned about payments for loss of property value and wants homes to be purchased for a buffer zone. • Concerned about health risk at nearby elementary school and whether LA City School Board approved the landfill expansion. • Billions of dollars should be set aside for the inevitable litigation if expansion is approved. • LA does not need a "Love Canal" so near to residents. 	<p>Refer to Topical Issue 25 regarding potential health effects of diesel emissions; Topical Issues 6 and 7 regarding groundwater protection; Topical Issue 29 regarding the performance of the liner system during seismic events; With regard to an inspector, Final SEIR Response 203 states that BFI landfill personnel, not LEA inspectors, will be required to randomly select loads and inspect them for hazardous waste at the rate of 1.5 load checks per 1,000 tons of solid waste received at the landfill whether it will be disposed of within the City or County. No additional inspectors will be hired. The LEA will monitor implementation of this load check program by landfill personnel. Regarding closure, if approved the combined City/County landfill would have a lifespan of approximately 26 years. As indicated in Final SEIR Response 37, any future development of the project site would be consistent with City and County General Plan elements and zoning requirements as conditioned by the City and County in providing entitlements for the project. Regarding campaign contributions, reports of political contributions are a matter of public record and on file with the City Ethics Commission. Refer to Topical Issue 3 regarding dust emissions during high wind conditions; Response 305 regarding alleged violations by BFI; Topical Issue 25 and Final SEIR Responses 183 and 184 regarding health issues; Refer to Final SEIR Response 180 regarding the affects of proposed project on property values and Topical Issue 22 regarding the compatibility of the landfill with residential uses. Refer to Topical Issue 15 regarding land use compatibility issues. The comment</p>

Table 2.5-1 (Cont.)
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
			regarding future litigation and legal fees is noted. The LA City School Board is not a responsible agency involved in approvals or permits for this project. The comments are noted with regard to the need for another "Love Canal."
143	Mr. & Mrs. P. Wilkinson	<ul style="list-style-type: none"> • Object to the landfill • Escaping methane gas will increase. • Water, air and diesel pollution will increase. • Diesel exhaust is highly carcinogenic. • Trucks wake them up early in the morning from Balboa Blvd. • Their property value will decrease. 	This comment is noted with regard to the landfill. Refer to Topical Issue 4 regarding methane gas containment; Topical Issue 9 regarding leachate collection and treatment; Topical Response 25 regarding the health risks associated with diesel exhaust; and Final SEIR Response 180 and Topical Issue 22 regarding the devaluation of property.
144	Ms. Dara Moss	<ul style="list-style-type: none"> • Opposed to the landfill • Concerned that the landfill will adversely affect Van Gogh, El Oro, and Robert Frost schools. • Toxins from the dump will ruin the community. • BFI has a history of not telling the truth. • Not impressed by the landfill, or BFI's attempts to influence students' opinions at Kennedy High School. • The landfill will ruin health, land, water, and the community. 	This comment is noted in regards to opposition of the landfill. Refer to Topical Issues 25 and 27 regarding health risks associated with the landfill and revised air quality studies; refer to Topical Issue 9 regarding leachate treatment and collection. These comments are noted regarding BFI and the landfill.
145	Mr. Richard L. & Anne Goodwin	<ul style="list-style-type: none"> • Odors, traffic, pollution and future water contamination has affected their property's value and their daily lives. • Do not allow a zoning change. 	These comments are noted.
146	Mr. Richard Moss & Ms. Toni Moss	<ul style="list-style-type: none"> • Opposed to the zone change • Believes pollutants will contaminate the community • Particulates can contaminate the water and air supply • Diesel fuel will tarnish the air. 	This comment is noted with regard to zoning. Refer to Topical Issue 25 regarding health risk issues; Final SEIR Responses 943 and 923 regarding the closure of LA county landfills and the project's need.

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> Granada Hills does not need a landfill here. The expansion will threaten the health and welfare of the community. 	
147	Mr. Gunnar Galins	Refer to Comment 139	Refer to Final SEIR Response 139
148	Ms. Brianna Moss	<ul style="list-style-type: none"> Opposed to the expansion and rezoning Fears the methane gas, and the carcinogenic diesel exhaust Believes the landfill liner will rupture and contaminate the water supply. The landfill will spoil Granada Hills Does not want Granada Hills to be LA's dumping ground. Human lives are at stake. 	These comments are noted regarding the expansion and rezoning, methane gas and diesel exhaust. Refer to Topical Issues 7, 8, and 9 regarding leachate collection, liner construction and groundwater protection. The comments are noted regarding Granada Hills and human lives.
149	Mr. Victor Vanacore	<ul style="list-style-type: none"> Objects to the landfill expansion 	This comment is noted.
150	Mr. Steven D. Kimmel	<ul style="list-style-type: none"> Objects to the zone change. The landfill has been a health hazard for over 23 years. The proximity of schools, residences, recreation areas, and water supplies are of grave concern. Diesel traffic will increase incidences of cancer. 	This comment is noted regarding the zone change.
151	Mr. James Regan	<ul style="list-style-type: none"> Do not place landfill so close to homes or schools. Balboa Blvd. is busy enough Consider the use of an alternate site. 	The comments are noted regarding site placement and traffic generation. Refer to Final SEIR Responses 1371 and 942-943 regarding the City's solid waste disposal needs and the feasibility of alternative sites.
152	Nancy & Phil Bogna	<ul style="list-style-type: none"> Opposed to the expansion Concerned that hazardous materials will be allowed in landfill. Landfill close to schools and water supply. Believes location is bad due to high winds, seismic activity. 	This comment is noted with regard to the expansion. Refer to Final SEIR Responses 1248, 1420, 1418, 1419, and 222 regarding monitoring measures preventing the intake of hazardous waste. Refer to Topical Issue 25 regarding the health risks associated with the landfill. Refer to Topical

Table 2.5-1 (Cont.)
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SUNSHINE CANYON PUBLIC HEARING (October 30 through December 3, 1998)

Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • Believes the decision has already been made concerning zoning. • Did not like the way the hearing was conducted. 	Issues 1 and 3 regarding seismicity and operations during high wind conditions. These comments are noted regarding the decision making process and the public hearing.
153	Mr. Stanley Plog, Ph.D.	Refer to Comment 43	Refer to Final SEIR Response 43
154	Ms. Rebecca Bendikson	Refer to Comment 142	Refer to Final SEIR Response 142
155	George & Renata Bauer	<ul style="list-style-type: none"> • Should not allow the expansion of Sunshine Canyon • Sunshine Canyon threatens Van Norman Lake. • Odors from the landfill can be smelled in the neighborhood. • Dust and litter is present in neighborhood from the landfill. • Property values will drop. • Traffic will increase. 	Refer to Topical Issues 8 and 9 regarding leachate collection and treatment. Refer to Topical Issue 4 regarding odor control measures. Refer to Topical Issues 3 and 18 regarding dust emissions and litter control measures at Sunshine Canyon. Refer to Final SEIR Response 180 regarding the affects of the proposed project on property values. Refer to Topical Issues 19 and 20 regarding traffic conditions at the landfill and haul routes.
156	Mr. Scott H. Byrd	<ul style="list-style-type: none"> • Opposed to the zone change and expansion • Methane gas cannot be contained • Diesel exhaust is carcinogenic • The water supply is threatened in the event of an earthquake • The expansion will spoil the community 	The comment is noted with regard to the zoning expansion. Refer to Topical Issue 4 regarding the containment of methane gas. Refer to Topical Issue 25 regarding the health risk assessment performed concerning diesel exhaust. Refer to Topical Issue 29 regarding the liner system's ability to withstand earthquakes. Refer to Topical Issue 22 regarding the compatibility of the landfill with residential uses.
157	Mr. George M. Grujich	<ul style="list-style-type: none"> • Objects to the expansion and zone change. • Air and water pollution is a danger. • Health hazards from diesel exhaust will be exponentially increased. • The expansion will force residents to relocate. 	This comment is noted regarding the opposition to the zone change and expansion. Refer to Topical Issue 25 regarding the performance of a Health Risk Assessment. Refer to Topical Issue 22 for the compatibility of the landfill with residential uses.
158	Ms. Heather Moss	<ul style="list-style-type: none"> • Opposed to the landfill expansion 	The comment is noted with regard to the landfill expansion.

Table 2.5-1 (Cont.)
INDEX MATRIX OF WRITTEN COMMENTS/ISSUES/RESPONSES AFTER THE
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Commenter No.	Name of Commenter	Issue(s)	Reference Response
		<ul style="list-style-type: none"> • Air, health, land, and solitude will be threatened. • Homes will be devalued. • The community will suffer. 	Refer to Topical Issue 22 regarding the compatibility of the landfill with residential uses. Refer to Final SEIR Response 180 regarding the affect of the landfill on property values.
159	Ms. Cleo Orense	<ul style="list-style-type: none"> • Objects to the landfill expansion • The landfill will be close to homes. • There will be air and water pollution. • There is a threat of seismic activity causing water contamination. • Diesel is a highly potent carcinogen. 	The comment is noted regarding the landfill expansion. Refer to Topical Issue 22 for compatibility with residential uses. Refer to Topical Issue 29 regarding the liner system's ability to withstand earthquakes. Refer to Topical Issues 8 and 9 regarding liner design and leachate collection, and Topical Issue 25 regarding the performance of a health risk assessment.

3.0 ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

The following Environmental Issue Key Response Index presents environmental issues in alphabetical order with the corresponding key responses. These comments and responses are provided in the Final SEIR, Section 3.0, Response to Comments. The Topical Issues (TI) are also presented in Section 2.0 of this document.

Table 3-1
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Aesthetics/Views	1368, 1515
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Air Quality, Environmental Setting	TI 3, 287, 288, 392, 393, 400, 767, 772
Air Quality , Fugitive Dust	TI 3, 63, 64, 67, 98, 99, 100, 157, 252, 354, 359, 499, 787
Air Quality, Health Risk	70, 71, 183, 184, 254, 255, 256, 257, 260, 316, 334, 408, 410
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Air Quality, Permits	1206
Air Quality, Project Consistency with Applicable Plans	30, 38, 455, 456, 466
Allergies	278
Alternative Daily Cover Materials	195, 520
Alternative Final Cover Design (see Closure of Existing Inactive City Landfill)	
Alternatives, Alternatives Not Evaluated	170, 172, 903
Alternatives, Environmental Comparison	124, 165, 893, 905, 909, 910, 1698
Alternatives, Selection Methodology	168, 751, 752, 753, 935, 938
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Ancillary Facilities (see Landfill Construction and Operations)	
Asthma	278
Balboa Inlet Tunnel (see DWP/MWD Water Treatment, Storage and Distribution Facilities)	
Bee Canyon Acreage Acquisition	1347, 1348
BFI Corporate Environmental Health and Safety Policies and Programs	305, 317, 318
Big-cone Douglas fir trees	TI 11

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Biological Resources	TI 10, TI 11, TI 12, 624, 911, 1397, 1401, 1402, 1405, 1410, 1412, 1413, 1519, 1547, 1555, 1556, 1557, 1559, 1560, 1561, 1562, 1564, 1565, 1568, 1569, 1572, 1573, 1638, 1642
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California Gnatcatcher	TI 10, 911, 912, 1559, 1560, 1573
Cancer Risks (see Air Quality, Health Risk)	
CEQA Requirements	47, 107, 208, 295, 342, 344, 345, 346, 348, 350, 351, 509, 510, 511, 577, 704, 757, 875, 876, 926, 938, 1363, 1649
Chiquita Canyon Landfill	TI 12, 172, 908
Citizen's Advisory Committee	917, 1436
Closure and Postclosure Maintenance After Completion of Proposed Project	198, 205, 596, 684, 685, 713, 971, 1017, 1050, 1296
Closure of Existing Inactive City Landfill	TI 13, 210, 356, 1398
Coast Live Oak Trees	1401, 1402, 1405, 1410, 1413, 1519, 1638
Compliance Record/Violations for the Previous City Landfill Operation	182, 183
Construction (see Landfill Construction and Operations)	
County Landfill Conditional Use Permit and Solid Waste Facilities Permit	1607, 1608
County Landfill improvements/modifications	349, 1384
Coyotes	1555, 1561
Composite Liner (see Landfill Environmental Protection and Control Systems Design)	
Cumulative Impacts	107, 108, 156, 509, 908, 1649
Daily Tonnage (see Peak and Average Daily Waste Intake Rates)	
Document Preparation/Administrative Draft SEIR databases submitted to City	1267, 1268, 1270
Drainage (see Surface Water, Engineered Collection and Control)	
Drainage Channels (see Surface Water, Engineered Collection and Control)	
Dr. G. Fred Lee	602
Dust (see Air Quality, Fugitive Dust)	

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
DWP/MWD Water Treatment, Storage and Distribution Facilities	77, 78, 79
Eagle Mountain Landfill Project	905
Earthquakes (see Earth Resources, Seismicity and Earth Resources, Geologic Hazards)	
Earth Resources, Geologic Hazards	TI 1, TI 2, 51, 131, 211, 361, 362, 363, 364, 365, 366, 367, 368, 369, 635, 636, 637, 692, 1117, 1120
Earth Resources, Seismicity	Topical Issue 1, 51, 370
Earth Resources, Slope Stability	6, 744, 745, 746, 747, 748, 749, 1360
East Canyon Dedication	1644, 1708
Electricity (see Utilities)	
Elevations (see Landfill Elevations)	
El Oro Way Elementary School (see Schools)	
Elsmere Solid Waste Management Facility	124
El Sobrante Landfill	1698
Employment	453, 458, 459
Energy Conservation	217, 476
Enforcement	188, 197, 336, 725
Enforcement Agency Working Agreement (see Working Agreement)	
Environmental Justice	1190
Environmentally Superior Alternative (see Immediate Combined City/County Landfill Operations Alternative)	
Erosion (see Surface Water, Engineered Collection and Control)	
Excavation (see Landfill Construction and Operations)	
Executive Summary	295
Faults (see Earth Resources, Seismicity and Earth Resources, Geologic Hazards)	
Final Closure and Postclosure Maintenance Plan (see Closure of Existing Inactive City Landfill)	
Fire and Emergency Medical Services	TI 21, 159, 228, 1660, 1661
Fires (see Fire and Emergency Medical Services)	

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Flaring (see Air Quality, Odors)	
Freeways (see Transportation/Circulation)	
Fugitive Dust (see Air Quality, Fugitive Dust)	
Gas Extraction (see Air Quality, Odors)	
Gas Generation and Odor Control (see Air Quality, Odors)	
Gas-to-Energy (see Energy Conservation)	
General Plan Amendment/Zone Change	1280, 1623, 1624, 1625
Geomembrane Liner (see Landfill Environmental Protection and Control Systems Design)	
Golden Eagle	TI 10, 1562
Grading (see Landfill Construction and Operations)	
Granada Hills-Knollwood Community Plan	TI 15, 1274, 1275
Green Waste/Wood Waste	86, 88, 105, 195, 475, 512
Groundwater, Environmental Setting	TI 6, 533, 534, 605, 606, 607, 608, 616, 624
Groundwater, Extraction and Treatment	613, 641, 643, 723
Groundwater, Leachate	TI 9, 79, 666, 712
Groundwater, Monitoring and Testing Requirements	TI 7, 103, 357, 570, 571, 572, 603, 631, 655, 666, 674, 725, 965, 986, 991, 999, 1013, 1017
Haul Routes (see Transportation/Circulation)	
Hazardous Wastes	TI 16, 222, 1248, 1418, 1419, 1420
Health Risk Analysis (see Air Quality, Health Risk)	
High-Density Polyethylene (see Landfill Environmental Protection and Control Systems Design)	
Hiking/Equestrian Trails (see Parks and Recreation)	
Human Health	183, 184, 278, 316
Immediate Combined City/County Landfill Operations Alternative	TI 23
Intake Rates (see Peak and Average Daily Waste Intake Rates)	

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Joseph Jensen Filtration Plant (see DWP/MWD Water Treatment, Storage and Distribution Facilities)	
Landfill Construction and Operations	1, 3, 4, 5, 59, 86, 186, 190, 191, 195, 206, 219, 222, 225, 227, 243, 309, 333, 339, 472, 473, 493, 499, 579, 597, 731, 887, 1632, 1634
Landfill Elevations	TI 22, 1632
Landfill Environmental Protection and Control Systems Design	TI 1, TI 2, TI 4, TI 5, TI 7, TI 8, TI 9, 2, 177, 520, 521, 602, 625, 680, 681, 682, 683, 690, 712, 716, 717, 879, 880, 974, 975, 976, 977, 978, 979, 1035, 1041, 1112, 1471
Landfill Liner (see Landfill Environmental Protection and Control Systems Design)	
Landslides (see Earth Resources, Geologic Hazards)	
Land Use	TI 15, 181, 649, 1274, 1275, 1278, 1279, 1280, 1623, 1624, 1625
Leachate Generation, Collection and Treatment	TI 9, 80, 81, 82, 175, 690, 707, 712, 887
Light and Glare	206, 219
Liner (see Landfill Environmental Protection and Control Systems Design)	
Litter	TI 18, 754, 1431, 1433
Los Angeles Reservoir (see DWP/MWD Water Treatment, Storage and Distribution Facilities)	
Materials Recovery Facilities/Transfer Stations	243
Maximum Daily Intake (see Peak and Average Daily Waste Intake Rates)	
Mitigation Reporting and Monitoring Program	47, 69, 511, 875, 876, 926, 1401, 1402, 1409, 1410
Monolithic Final Cover (see Closure of Existing Inactive City Landfill)	
Mountain Lions	1555, 1561
Noise	TI 14, 104, 105, 1598, 1599, 1600
No Project Alternative	165
Northridge Earthquake	TI 2
Noticing, Distribution and Public Availability of CEQA Documents	295, 342, 344, 345, 346
NPDES Requirements and Permitting	549, 591

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Oak Trees (see Coast Live Oak Trees)	
Odors (see Air Quality, Odors)	
O'Melveny Park	1433
Open Space Area (\pm 100 acre open space area)	TI 15, 181, 1278, 1279, 1519
Operations (see Landfill Construction and Operations)	
Parks and Recreation	272, 1347, 1348, 1644
Peak and Average Daily Waste Intake Rates	1, 186, 339
Permitted Daily Tonnage (see Peak and Average Daily Waste Intake Rates)	
Previous Landfill Operation in the City (see Compliance Record/Violations for the Previous City Landfill Operation)	
Project Need	891, 895, 897, 923, 942, 943, 1154, 1157
Property Values	180
Public Review (see Noticing, Distribution and Public Availability of CEQA Documents)	
Public Review Period for Draft SEIR	344
Public Tours of Project Site	309
Rainfall	532, 536
Raptors	TI 10, 1563, 1569
Recreation (see Parks and Recreation)	
Reduced Volume Alternative	910
Regional Solid Waste Generation Forecasts	1649
Related Projects (see Cumulative Impacts)	
Reptiles	TI 10
Residential Compatibility	TI 22
Revegetation (existing inactive City Landfill) (see Closure of Existing Inactive City Landfill)	
Revegetation (\pm 100 acre open space area) (see Open Space Area)	
Ridgelines	TI 22
Riparian Habitat (see Wetlands)	
Robert Frost Middle School (see Schools)	

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
San Fernando Earthquake	TI 1
San Fernando Valley Groundwater Basin (see Groundwater, Environmental Setting)	
Scavenging Birds (see Vectors)	
Schools	257, 273
Sediment (see Surface Water, Engineered Collection and Control)	
Sedimentation Basins (see Surface Water, Engineered Collection and Control)	
Seismic Groundshaking (see Earth Resources, Geologic Hazards)	
Seismicity (see Earth Resources, Seismicity)	
Settlement Agreements	1635, 1636, 1637, 1640, 1642
Sinus	278
Slope Stability (see Earth Resources, Slope Stability)	
Soils Stockpile	5
Springs and Seeps (see Groundwater, Environmental Setting)	
Stormwater Runoff (see Surface Water, Engineered Collection and Control)	
Subtitle D Requirements (see Landfill Environmental Protection and Control Systems Design)	
Surface Water, Engineered Collection and Control	TI 5, 175, 521, 535, 562, 564, 576, 584, 588, 594, 597
Surface Water, Environmental Setting	TI 5, 532, 536, 549, 574, 591
Surface Water, Monitoring and Testing Requirements	592, 678
Surface Water, Surface Water Leaving Project Site	TI 5, 83, 175, 176, 535
Threatened and Endangered Plant and Animal Species (see Biological Resources)	
Tonnage (see Peak and Average Daily Waste Intake Rates)	
Traffic (see Transportation/Circulation)	

Table 3-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Transportation/Circulation	TI 19, TI 20, 26, 88, 89, 92, 106, 138, 151, 153, 154, 155, 156, 191, 207, 227, 454, 735, 1239, 1383, 1387, 1388, 1391, 1462, 1464, 1465, 1725, 1726
Unsaturated Zone Monitoring (see Groundwater, Monitoring and Testing Requirements)	
Utilities	136, 211
Vadose Zone Monitoring (see Groundwater, Monitoring and Testing Requirements)	
Van Gogh Street Elementary School (see Schools)	
Vectors	TI 17, 84, 85, 225
Vegetative Layer (see Closure of Existing Inactive City Landfill)	
Venturan Coastal Sage Scrub	TI 10, 911, 1559, 1560
Views of Project Site (see Aesthetics/Views)	
Waste Loads (see Peak and Average Daily Waste Intake Rates)	
Wasteshed Areas	TI 20, 333
Water Quality (see Groundwater, Monitoring and Testing Requirements and Surface Water, Monitoring and Testing Requirements)	
Water Use (see Utilities)	
Weldon Canyon Flood Control Channel (see Surface Water, Surface Water Leaving Project Site)	
Wetlands	TI 12, 624, 1397, 1642
Wildlife Movement	1564, 1565, 1572
Wind Conditions at Project Site	TI 3, 287, 288, 400
Working Agreement	188, 197, 579

APPENDICES A-1 TO A-9

KEY ISSUE RESPONSE MATRIX

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Aesthetics/Views	Sections 3.1.15, 4.18	1368, 1515	98, 111	
Air Quality , Assessment Methodology	Section 4.2	55, 58, 61, 62, 63, 65, 66, 68, 96, 97, 108, 245, 246, 252, 334, 392, 393, 758, 759, 772, 787	6, 34, 39, 43, 47, 133	Topical Issue 27
Air Quality, Diesel Emissions	Sections 4.2.7, 4.2.8	Appendix D4	47, 133	Topical Issue 25, 6
Air Quality, Environmental Setting	Sections 3.1.3, 4.2	Topical Issue 3, 287, 288, 392, 393, 400, 767, 772	N/A	
Air Quality , Fugitive Dust	Sections 4.2.3, 4.2.7	Topical Issue 3, 63, 64, 67, 98, 99, 100, 157, 252, 354, 359, 499, 787	24, 28, 68, 91, 98, 113, 114, 120, 133	Topical Issue 3
Air Quality, Health Risk	Sections 4.2.9, 4.9.5	70, 71, 183, 184, 247, 254, 255, 256, 257, 260, 278, 316, 334, 408, 410	4, 6, 29, 33, 43, 88	Topical Issues 25 and 27
Air Quality, Nitrogen Dioxide Standards	Sections 4.2.8, 4.2.10	62, 63, 64, 250, Appendix D4	33, 34, 133	Topical Issue 25, 6
Air Quality , Odors	Section 4.2.13	Topical Issue 4, 73, 74, 75, 76, 101, 102, 162, 163, 196, 214, 1214	68, 100, 102	Topical Issue 4, 132
Air Quality, Permits	Section 4.2	1206	N/A	
Air Quality, Project Consistency with Applicable Plans	Section 4.2.10	30, 38, 455, 456, 466	N/A	
Air Quality Revisions	N/A	Appendix D4	N/A	Topical Issue 27
Airport Safety (Bird Strikes)	Section 4.9.7	N/A	N/A	
Allergies	Section 4.2.9	278	4, 88	Topical Issue 25
Alternative Daily Cover Materials	Section 2.10.4	195, 520	N/A	
Alternative Final Cover Design (see Closure of Existing Inactive City Landfill)				
Alternatives, Alternatives Not Evaluated	Section 1.9.1	170, 172, 903	46	114
Alternatives, Environmental Comparison	Sections 1.9.2, 5.0	124, 165, 893, 905, 909, 910, 1698	N/A	
Alternatives, Immediate Combined City/County Landfill Operations	Sections 1.9.5, 5.2.3, 5.6	Topical Issue 23	N/A	Topical Issue 23
Alternatives, No Project	Sections 1.9.3, 5.2.1, 5.4.2	165	N/A	
Alternatives, Remote Landfills	Section 5.10	893, 905	46	
Alternatives, Selection Methodology	Section 5.1	168, 751, 752, 753, 935, 938	N/A	

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Alternatives, Waste Management Technologies and Strategies	Sections 5.2.6, 5.9	39, 44, 169, 528, 936, 948, 949, 1371	N/A	
Ancillary Facilities (see Landfill Construction and Operations)				
Asthma	Section 4.2.9	278	29, 33	Topical Issue 25
Balboa Inlet Tunnel (see DWP/MWD Water Treatment, Storage and Distribution Facilities)				
Bee Canyon Acreage Acquisition	Section 4.14.4	1347, 1348	69, 112	Topical Issue 30
BFI Corporate Environmental Health and Safety Policies and Programs	Appendix C11	305, 317, 318	N/A	
Big-cone Douglas fir trees	Section 4.4.1	Topical Issue 11	N/A	Topical Issue 11
Biological Resources	Section 4.4	Topical Issues 10, 11, and 12; 624, 911, 1397, 1401, 1402, 1405, 1410, 1412, 1413, 1519, 1547, 1555, 1556, 1557, 1559, 1560, 1561, 1562, 1564, 1565, 1568, 1569, 1572, 1573, 1638, 1642	24, 67	Topical Issues 10 and 11
Blind Canyon	Section 5.7.2	168, 750, 935, 1702	47	
Bronchitis	N/A	278	N/A	Topical Issue 25
California Condor	Section 4.4.1	1557, 1558	N/A	
California Gnatcatcher	Section 4.4.1	Topical Issue 10, 911, 912, 1559, 1560, 1573	N/A	Topical Issue 10
Cancer Risks (see Air Quality, Health Risk)				
CEQA Requirements	Sections 1.2, 1.3, 1.4	47, 107, 208, 295, 342, 344, 345, 346, 348, 350, 351, 509, 510, 511, 577, 704, 757, 875, 876, 926, 938, 1363, 1649	N/A	
Chiquita Canyon Landfill	Section 2.3.2	Topical Issue 2, 172, 908	N/A	Topical Issue 2
Citizen's Advisory Committee	Section 4.9.5	917, 1436	87	
Closure and Postclosure Maintenance After Completion of Proposed Project	Section 2.15	198, 205, 596, 684, 685, 713, 971, 1017, 1050, 1296	47, 56, 61	
Closure of Existing Inactive City Landfill	Section 1.5.1	Topical Issue 13, 37, 210, 356, 1398	38, 49, 54, 72, 89, 93, 94, 110, 119, 120	Topical Issue 13

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion¹	FSEIR Discussion and Responses²	GPA/ZC (Key Group Meeting) Responses³	Public Hearing Responses⁴
Coast Live Oak Trees	Section 4.4.1	Topical Issue 11, 1401, 1402, 1405, 1410, 1413, 1519, 1638	7, 21, 67, 95, 98, 121	Topical Issue 11
Compliance Record/Violations for the Previous City Landfill Operation	N/A	182, 183	54	Topical Issue 26
Construction (see Landfill Construction and Operations)				
County Landfill Conditional Use Permit and Solid Waste Facilities Permit	Section 1.5.1	339, 1607, 1608	23, 62, 67, 87, 106, 107, 108	
County Landfill Improvements/ Modifications	Section 4.13.5	349, 1384	N/A	
Cover Materials (Final) and Landfill Capacity Calculations	Section 2.6.2	198, 199	101, 130	58
Coyotes	N/A	1555, 1561	N/A	
Composite Liner (see Landfill Environmental Protection and Control Systems Design)				
Cultural Resources	Section 4.19	N/A	N/A	
Cumulative Impacts	Section 3.2	107, 108, 156, 509, 908, 1649	29, 34	
Daily Tonnage (see Peak and Average Daily Waste Intake Rates)				
Disposal Capacity Remaining in Los Angeles County	Section 2.3.2, Table 2.3-1	Table 2.3-1 (Revised), 121, 891, 943	49, 115	
Document Preparation/Administrative Draft SEIR databases submitted to City	Section 1.6.5	1267, 1268, 1270	N/A	
Drainage (see Surface Water, Engineered Collection and Control)				
Drainage Channels (see Surface Water, Engineered Collection and Control)				
Dust (see Air Quality, Fugitive Dust)				
DWP/MWD Water Treatment, Storage and Distribution Facilities	Section 4.3.2	77, 78, 79, 157	28, 35, 42, 59, 78, 93, 109	86
Eagle Mountain Landfill Project (Remote Landfill)	Sections 1.9.9, 5.10.1	905	N/A	

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Earthquakes (see Earth Resources, Seismicity and Earth Resources, Geologic Hazards)				
Earth Resources, Geologic Hazards	Section 4.1.3 - 4.1.6	Topical Issues 1 and 2; 51, 131, 211, 361, 362, 363, 364, 365, 366, 367, 368, 369, 635, 636, 637, 692, 1117, 1120	N/A	Topical Issues 1 and 2
Earth Resources, Seismicity	Section 4.1.4	Topical Issue 1, 51, 370	30, 102, 103, 123, 124, 127	Topical Issues 1, 2, and 29
Earth Resources, Slope Stability	Section 4.1.6	6, 744, 745, 746, 747, 748, 749, 1360	123, 127	
East Canyon Dedication	Section 4.14.1	1644, 1708	69, 94, 112	Topical Issue 30
Electricity (see Utilities)				
Elevations (see Landfill Elevations)				
El Oro Way Elementary School (see Schools)				
Elsmere Solid Waste Management Facility	Sections 1.9.6, 5.7.1	124, 239	47	
El Sobrante Landfill	Sections 1.9.7, 5.8.1	1698	N/A	
Employee Safety and Site Security	Sections 4.9.4, 4.14.2	305	N/A	
Employment	Section 4.2.10	453, 458, 459	N/A	
Energy Conservation	Section 4.2.10	217, 476	100	
Enforcement	Section 2.16	336, 725	7, 87, 134	132
Enforcement Agency Working Agreement (see Working Agreement)				
Environmental Justice	Appendix C7	1190	N/A	
Environmentally Superior Alternative (see Immediate Combined City/County Landfill Operations Alternative)				
Erosion (see Surface Water, Engineered Collection and Control)				
Excavation (see Landfill Construction and Operations)				
Executive Summary	N/A	295	N/A	
Faults (see Earth Resources, Seismicity and Earth Resources, Geologic Hazards)				

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion¹	FSEIR Discussion and Responses²	GPA/ZC (Key Group Meeting) Responses³	Public Hearing Responses⁴
Final Closure and Postclosure Maintenance Plan (see Closure of Existing Inactive City Landfill)				
Final SEIR Revisions/Additions	N/A	Section 2.0	N/A	
Fire and Emergency Medical Services	Section 4.14.1	Topical Issue 21, 159, 228, 1660, 1661	41	Topical Issue 21
Fires (see Fire and Emergency Medical Services)				
Flare Stations	Section 2.7.7	97	102	
Flaring (see Air Quality, Odors)				
Freeways (see Transportation/Circulation)				
Fugitive Dust (see Air Quality, Fugitive Dust)				
Gas Extraction (see Air Quality, Odors)				
Gas Generation and Odor Control (see Air Quality, Odors)				
Gas-to-Energy (see Energy Conservation)				
General Plan Amendment/Zone Change	Section 4.7.1	1274, 1280, 1623, 1624, 1625	11, 72, 73, 79, 81, 82, 89, 107, 110	Topical Issues 15 and 24
Geomembrane Liner (see Landfill Environmental Protection and Control Systems Design)				
Golden Eagle	Section 4.4.1	Topical Issue 10, 1562	N/A	
Grading (see Landfill Construction and Operations)				
Granada Hills-Knollwood Community Plan	Section 4.7.1	Topical Issue 15, 1274, 1275	N/A	Topical Issue 15
Green Waste/Wood Waste	Section 2.5.7	86, 88, 105, 195, 475, 512	72, 80	132
Groundwater, Environmental Setting	Section 4.3.2	Topical Issue 6, 533, 534, 605, 606, 607, 608, 616, 624	37, 128	Topical Issue 6
Groundwater, Extraction and Treatment	Section 4.3.2	613, 641, 643, 723	37	
Groundwater, Leachate	Section 4.3.2	Topical Issue 9, 79, 666, 712	37	Topical Issue 9

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Groundwater, Monitoring and Testing Requirements	Section 4.3.2	Topical Issue 7, 103, 357, 570, 571, 572, 602, 603, 631, 655, 657, 663, 666, 674, 725, 965, 986, 991, 999, 1013, 1017	37	Topical Issue 7
Haul Routes (see Transportation/Circulation)				
Hazardous Wastes	Section 4.9.1	Topical Issue 16, 222, 1248, 1418, 1419, 1420	37	Topical Issue 16
Health Risk Analysis (see Air Quality, Health Risk)				
High-Density Polyethylene (see Landfill Environmental Protection and Control Systems Design)				
Hiking/Equestrian Trails (see Parks and Recreation)				
Human Health	Section 4.2.9	183, 184, 278, 316	4, 6, 29, 43	Topical Issue 25
Inactive Landfill Area	Sections 2.4.3 and 2.5.1	210	72, 93, 94, 123	50
Intake Rates (see Peak and Average Daily Waste Intake Rates)				
Joseph Jensen Filtration Plant (see IDWP/MWD Water Treatment, Storage and Distribution Facilities)				
Landfill Construction and Operations	Section 2.0	1, 3, 4, 5, 59, 86, 186, 190, 191, 195, 206, 219, 222, 225, 227, 243, 309, 333, 339, 472, 473, 493, 499, 579, 597, 731, 887, 1632, 1634	98, 133, 18, 47, 59, 98, 100, 101, 104, 107, 110, 113	114
Landfill Elevations	Section 2.6.3	Topical Issue 22, 1632	67, 68, 69, 78, 98, 111	
Landfill Environmental Protection and Control Systems Design	Section 2.7	Topical Issues 1, 2, 4, 5, 7, 8, and 9; 2, 177, 198, 199, 201, 520, 521, 602, 625, 680, 681, 682, 683, 690, 712, 716, 717, 879, 880, 974, 975, 976, 977, 978, 979, 1035, 1041, 1112, 1471, Figures 2.7-3a and 2.7-3b	72, 93, 100, 102, 103, 116, 125, 126, 133	Topical Issues 1, 2, 4, 5, 7, 8, 9, and 29
Landfill Liner (see Landfill Environmental Protection and Control Systems Design)				

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Landfill Siting Criteria	Section 2.6.1	N/A	N/A	
Landslides (see Earth Resources, Geologic Hazards)				
Land Use	Section 4.7	Topical Issue 15, 181, 649, 1274, 1275, 1278, 1279, 1280, 1623, 1624, 1625	11, 66, 72, 73, 82, 89, 93, 106, 107, 109, 110, 114	Topical Issue 15
Leachate Generation, Collection and Treatment	Section 2.7.4	Topical Issue 9, 80, 81, 82, 175, 690, 707, 712, 887	37, 72, 103	Topical Issue 9
Light and Glare	Section 4.18	206, 219	N/A	
Liner (see Landfill Environmental Protection and Control Systems Design)				
Litter	Section 4.9.3	Topical Issue 18, 754, 1431, 1433	54, 91, 104	Topical Issue 18
Load Check Program	Section 2.8	203, 230, 231	11	132, 142
Los Angeles Reservoir (see DWP/MWD Water Treatment, Storage and Distribution Facilities)				
Materials Recovery Facilities/Transfer Stations	Section 4.13.1	243	131	39
Maximum Daily Intake (see Peak and Average Daily Waste Intake Rates)				
Mitigation Reporting and Monitoring Program	Sections 2.16, 7.0., Table 7.4-1	47, 69, 336, 511, 875, 876, 926, 1401, 1402, 1409, 1410	55, 90	132
Monolithic Final Cover (see Closure of Existing Inactive City Landfill)				
Mountain Lions	Section 4.4.1	1555, 1561	122	
Natural Resources (Oil Production)	Section 4.8	181, 649	N/A	
Noise	Section 4.5	Topical Issue 14, 104, 105, 1598, 1599, 1600	79, 80, 89, 110	Topical Issue 14
Northridge Earthquake	Section 4.1.4	Topical Issue 2	123, 127	Topical Issue 2
Noticing, Distribution and Public Availability of Previously Prepared Documents	Sections 1.2, 1.3, 1.4	Section 1.2, 295, 342, 344, 345, 346, Appendix B8	N/A	Section 1.4 and 1.6, 83, 109, 119
NPDES Requirements and Permitting	Section 4.3.1	Topical Issue 5, 549, 591	N/A	
Oak Trees (see Coast Live Oak Trees)				

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Odors (see Air Quality, Odors)				
O'Melveny Park	Sections 4.9.3, 4.14.4	1433	78, 80	Topical Issue 18
Open Space Area (± 100 acre open space area)		Topical Issue 15, 181, 1278, 1279, 1519	13, 21, 25, 89	Topical Issue 15
Open Space Dedication	Section 4.14.4	1347, 1348, 1644	69, 112	Topical Issue 30
Operations (see Landfill Construction and Operations)				
Parks and Recreation	Section 4.14.4	272, 1347, 1348, 1644	54	
Peak and Average Daily Waste Intake Rates	Section 2.6.2	1, 186, 339	N/A	
Permitted Daily Tonnage (see Peak and Average Daily Waste Intake Rates)				
Postclosure Recreational Use	N/A	205, 1296	56, 94	
Previous Landfill Operation in the City (see also Compliance Record/Violations for the Previous City Landfill Operation)	Section 1.5.2, Appendix C5			
Project Need	Section 2.3	891, 895, 897, 923, 942, 943, 1154, 1157	N/A	
Project Objectives	Section 2.2	N/A	N/A	
Property Values	Section 4.11	Topical Issue 22, 180	18, 31, 33, 117	Topical Issue 22
Public Review (see Noticing, Distribution and Public Availability of CEQA Documents)				
Public Review Period for Draft SEIR	Sections 1.2, 1.3, 1.4	344	82	
Public Tours of Project Site	N/A	309	N/A	
Rainfall	Section 4.3.1	532, 536, 540	N/A	
Raptors	Section 4.4.1	Topical Issue 10, 1563, 1569	N/A	Topical Issue 10
Recreation (see Parks and Recreation)				
Recycling Facility (see Landfill Construction and Operations)				
Regional Solid Waste Generation Forecasts	Section 2.4	1649	N/A	50

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Related Projects (see Cumulative Impacts)				
Reptiles	Section 4.4.1	Topical Issue 10	N/A	Topical Issue 10
Residential Compatibility	Section 4.7.1	Topical Issue 22	11, 18,	Topical Issues 15, 22, 24
Revegetation (existing inactive City Landfill) (see Closure of Existing Inactive City Landfill)				
Revegetation (±100 acre open space area) (see Open Space Area)				
Ridgelines	Section 4.7.1	Topical Issue 22	42, 59, 65, 98, 111, 118, 135	Topical Issue 22
Riparian Habitat (see Wetlands)				
Risk of Explosion	Section 4.9.6	211	102	
Robert Frost Middle School (see Schools)				
San Fernando Earthquake	Section 4.1.4	Topical Issue 1	123, 127	Topical Issue 1
San Fernando Valley Groundwater Basin (see Groundwater, Environmental Setting)				
Scavenging Birds (see Vectors)				
Schools	Section 4.14.3	257, 273, Appendix D2	59	
Sediment (see Surface Water, Engineered Collection and Control)				
Sedimentation Basins (see Surface Water, Engineered Collection and Control)				
Seismic Groundshaking (see Earth Resources, Geologic Hazards)				
Seismicity (see Earth Resources, Seismicity)				
Settlement Agreements	Appendix C3	1635, 1636, 1637, 1640, 1642	N/A	
Sewer Sludge	Section 2.9	887	N/A	49
Sinus	Section 4.2.9	278	134	Topical Issue 25

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Slope Stability (see Earth Resources, Slope Stability)				
Soils Stockpile	Section 4.1.1	5	N/A	
Springs and Seeps (see Groundwater, Environmental Setting)				
Stormwater Runoff (see Surface Water, Engineered Collection and Control)				
Subtitle D Requirements (see Landfill Environmental Protection and Control Systems Design)				
Surface Water, Engineered Collection and Control	Sections 2.7.5, 4.3.1	Topical Issue 5, 175, 521, 535, 562, 564, 576, 584, 588, 594, 597	23, 30, 129	Topical Issue 5
Surface Water, Environmental Setting	Section 4.3.1	Topical Issue 5, 532, 536, 549, 574, 591	N/A	Topical Issue 5
Surface Water, Monitoring and Testing Requirements	Section 4.3.1	Topical Issue 5, 592, 678	42, 135	Topical Issue 5
Surface Water, Surface Water Leaving Project Site	Section 4.3.1	Topical Issue 5, 83, 175, 176, 535	23, 129	Topical Issue 5
Threatened and Endangered Plant and Animal Species (see Biological Resources)				
Tonnage (see Peak and Average Daily Waste Intake Rates)				
Traffic (see Transportation/Circulation)				
Transportation/Circulation	Section 4.13	Topical Issues 19 and 20; 26, 30, 88, 89, 92, 106, 138, 151, 153, 154, 155, 156, 191, 207, 227, 454, 735, 1239, 1383, 1387, 1388, 1391, 1462, 1464, 1465, 1725, 1726	26, 34, 96, 131, 132	Topical Issue 19, Topical Issue 20
Unsaturated Zone Monitoring (see Groundwater, Monitoring and Testing Requirements)				
Utilities	Sections 2.5.3, 4.16	136, 211	N/A	
Vadose Zone Monitoring (see Groundwater, Monitoring and Testing Requirements)				

ENVIRONMENTAL ISSUE KEY RESPONSE INDEX (Cont.)

Key Issue ¹	DSEIR Discussion ¹	FSEIR Discussion and Responses ²	GPA/ZC (Key Group Meeting) Responses ³	Public Hearing Responses ⁴
Van Gogh Street Elementary School (see Schools)				
Vectors	Sections 2.11.3, 4.9.2	Topical Issue 17, 84, 85, 225	135	Topical Issue 17
Vegetative Layer (see Closure of Existing Inactive City Landfill)				
Venturan Coastal Sage Scrub	Section 4.4.1	Topical Issue 10, 911, 1559, 1560	N/A	Topical Issue 10
Views of Project Site (see Aesthetics/Views)				
Volumes of Documents	Appendix C1	295	N/A	
Waste Loads (see Peak and Average Daily Waste Intake Rates)				
Wasteshed Areas	Sections 2.9, 4.13.1	Topical Issue 20, 333	72	Topical Issue 20
Water Quality (see Groundwater, Monitoring and Testing Requirements and Surface Water, Monitoring and Testing Requirements)				
Water Use (see Utilities)				
Weldon Canyon Flood Control Channel (see Surface Water, Surface Water Leaving Project Site)				
Wetlands	Section 4.4.2	Topical Issue 12, 624, 1397, 1642	N/A	Topical Issue 12
Wildlife Movement	Section 4.4.1	1564, 1565, 1572	N/A	
Wind Conditions at Project Site	Section 4.2.2	Topical Issue 3, 287, 288, 400	28, 42, 59, 68, 91, 98, 113	Topical Issue 3
Working Agreement	Section 2.5.4	188, 197, 579	N/A	Topical Issue 28, 132

Notes: The following documents are on file with the City of Los Angeles, Department of City Planning (City Plan Case No. 98-0184 MPR/ZC/GPA):

1. *Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill* (July 1997).
2. *Final Subsequent Environmental Impact Report, Sunshine Canyon Landfill* (June 1998).
3. *General Plan Amendment/Zone Change for the Sunshine Canyon Landfill Project* (February 1998). This document includes comments from the Key Group Meeting held on November 18, 1997.
4. *Responses to Comments Public Hearing on the General Plan Amendment/Zone Change Report (October 29, 1998) for the Proposed Sunshine Canyon Landfill City of Los Angeles* (December 1998). Note the referenced responses include only those topical responses that are enhancements or additions to the topical responses included in the certifiable Final SEIR and other responses to individual comments referenced in this document.

City of Los Angeles Refuse Disposal Options

Introduction

The City of Los Angeles (City) through its Bureau of Sanitation in the Department of Public Works has provided solid resources management services to approximately 720,000 residential households within the City of Los Angeles since 1890. Every week three collection vehicles visit each of our customers to separately collect recyclables, yard trimmings and refuse at curbside. The Bureau also provides special residential collection services such as bulky item, appliance and bulky brush collection.

The City's collection of solid waste has changed dramatically since its inception in 1890 when the first solid waste crematory (incinerator) was constructed and the City provided disposal service. In later years non-combustible refuse (garbage) was collected for delivery to hog ranches and combustible rubbish was burned in backyard incinerators or collected and disposed by private contractors. In 1943, residential collection was turned over to City forces. In 1957 after backyard incineration was banned as a part of the smog control program, the City added the collection and disposal of combustible rubbish as part of its refuse collection program. Since 1957 the City used landfill disposal sites located in and around the City to dispose of all materials collected at curbside. In the early 1960s, the City eliminated the City-wide recycling program by removing the requirement to separate recyclables from household refuse. All household refuse was then collected in a single container and disposed in local City, County and private landfills. During the 1970s and 1980s, local City landfills began closing and new landfill sites became harder to secure. In the early 1980s the Bureau of Sanitation began investigating recycling and waste to energy technology as ways to reduce our reliance on landfills.

A waste to energy facility was authorized for study in 1979, but in 1987, after eight years of development, the project was canceled. Also, during this time a pilot curbside recycling operations were initiated in West Los Angeles in 1985 and expanded to the San Fernando Valley in 1987 and into all Council Districts in 1989, finally reaching a total of 95,000 households.

In order to control the growing waste stream and improve operational efficiency, the Mayor and City Council approved the implementation of a full curbside recycling and automated refuse and yard trimmings collection program in early 1990; the program roll out began later that same year. The yellow bin recycling program and the automated collection system became a Citywide program in 1995. In 1997, just two years after the five year implementation of the yellow bin system, the City embarked on the next generation of curbside recycling and began the implementation of the automated blue container recycling

system. This new system, which is the state of the art in recycling, has been rolled out Citywide as of January 1999. This program has more than doubled the tonnage of recyclables diverted by our customers from landfills over the last 18 months.

The City's solid waste management practices have come a long way since 1890 and have transitioned from a collection and disposal oriented structure to a recycling operation back to a disposal operation and since 1990 returning whole heartedly back to recycling. Even the term for the materials we collect and manage has changed from solid waste to solid *resources*. Over the past several years, the Bureau has implemented programs which now divert from landfills over 42% of all materials that we collect at curbside and manage, while also achieving a 25% reduction in collection staffing levels through increased efficiencies over a four year period.

The shift in emphasis in the Bureau's solid resources business has also affected our need for support facilities. Where, for example, the City used to own and operate several landfills which provided disposal service to our collection staff, the Bureau now disposes of the remaining refuse it collects in three landfills, two operated by private entities and one by the Los Angeles County Sanitation District. The City's involvement in its landfills is now focused on closure and maintenance of the six inactive City owned landfills.

The doubling of the recyclables collected at curbside has resulted in the City contracting with several Recycling Centers owned and operated by the private sector to receive, clean, process, and market the recyclables. The Bureau also has several contracts with private contractors to accept, clean, grind, and mulch or compost our yard trimmings which is a significant element in our achieving such a high recycling rate. The City now needs to invest in infrastructure to support these new solid resources management activities. Acquiring City-owned and operated facilities will provide more control over future cost increases and more options for managing the materials we collect at curbside. The development of infrastructure in most cases can result in a net cost savings when compared to future private sector contract costs.

Current Disposal System

The Bureau currently disposes about 3,400 tons per day of refuse in three landfill sites, down from 4,500 tons per day in 1990 as discussed below:

The Bradley Landfill, owned and operated by Waste Management, Inc. (WMX), receives approximately 2,250 tons per day of refuse under a contract with the City which expires July 1, 2001. This contract guarantees the City disposal for at least the refuse collected in the North and South Central districts, about 1,400 tons per day. Additional tonnage is delivered either by direct haul from the East Valley area or by transfer from the Harbor District. Current disposal prices for the City are \$18.89 per ton for refuse delivered in transfer vehicles and \$21.80 per ton for refuse delivered by collection truck. The gate rate at the Bradley Landfill is \$29.50 per ton.

The Sunshine Canyon Landfill, owned and operated by Browning Ferris Industries (BFI), receives approximately 1,000 tons per day of refuse under a contract which expires in February 2004. BFI guarantees disposal to a portion of the City's refuse collected in the East Valley, West Valley, and Western Districts. The current disposal price for the City is \$18.56 per ton for all refuse; the gate rate at the Sunshine Canyon Landfill is \$35 per ton.

The Calabasas Landfill, owned and operated by the L.A. County Sanitation Districts, receives approximately 150 tons per day of refuse from a small City area in the West Valley. Only County residents within a certain watershed, or geographical area, can use this disposal site. Other City refuse collected outside this watershed can not be taken to this landfill. The current rate for disposal at the Calabasas Landfill is \$26.06 per ton.

How Disposal Capacity Affects the Need for Solid Resources Infrastructure

The future availability of local refuse disposal facilities will affect the timing of the need for a refuse transfer facility in the San Fernando Valley. If a transfer facility is needed, it must either be sited, permitted, constructed and operated by the City or procured from the private sector through a service contract. Analysis of this need is as follows:

The Bradley Landfill does not have a closure date, but will close when it reaches a final elevation and capacity. This may allow the facility to remain open past mid-2001 for 1-2 more years, thus only delaying the need for a transfer facility at this time provided the landfill continues to be available to the City through an extension of the current disposal contract;

The Sunshine Canyon Landfill has prepared an application for a Conditional Use Permit (CUP) to expand their disposal facility into the City of Los Angeles. A Final Environmental Impact Report has been prepared and the matter will be considered by the City Planning Commission in February, 1999.

The design and development of a transfer station in the Valley will be directly tied to changes in local capacity over the next two years. The Bureau must acquire additional disposal capacity for approximately 2,000 tons per day of refuse before 2001, to ensure disposal capacity for all City-collected refuse after the current contracts expire. Disposal capacity in the region is affected both by permit restrictions and the difficulty in siting new landfills. Permitting of new disposal facilities can take 15 years, with no guarantee of success. Refuse generation by the City is expected to increase as the economy improves and density increases through an influx of new residents.

If the Sunshine Canyon Landfill expansion is not approved, the Bureau must procure disposal capacity beyond the current contracts for all collection areas except for a small portion of the West Valley which can continue to dispose at the Calabasas Landfill. The Bureau has created a Study Area task force to prepare a Disposal Capacity Request for Proposal (RFP) to procure disposal capacity beginning in July 2001 for refuse currently delivered by transfer truck to the Bradley Landfill under the existing contract.

In July 2001, upon expiration of the Bradley Landfill disposal contract, and with the caveat that no new in-basin disposal is available, all direct haul refuse from the East Valley and Western Districts can be directed to the Sunshine Canyon Landfill. The remaining refuse from the North Central, South Central, and Harbor Districts will be directed to a new contract resulting from the RFP for Disposal Services or also delivered by transfer trailer to Sunshine Canyon.

After the Bradley Landfill is closed, and if Sunshine Canyon is not available to the City after the current contract expires, the Bureau will be faced with higher transportation costs to deliver refuse to more distant disposal facilities due to construction of a new transfer station and paying higher transportation costs. A transfer station will have to be constructed in the San Fernando Valley at a capital cost of over \$10 million to service these areas.

Disposal will be available, but at a greater distance. The Chiquita Canyon landfill will have available capacity, but is 19 miles further from the Central L.A. facility than the Bradley Landfill, thus increasing transportation costs. Other facilities such as El Sobrante Landfill in Riverside, Lancaster Landfill in the Antelope Valley, and Bowerman Landfill in south Orange County could have available disposal capacity, but it will cost considerably more because the average distance from the central Los Angeles area to these more remote located landfills is 60-70 miles (one way).

Currently Permitted Disposal Facilities and relative Distance from Central L.A.			
Facility	Distance (one-way miles)	Capacity	Tons Per Day
Chiquita Canyon Landfill (Republic)	40.4	23 million tons	5,000
El Sobrante (WMX)	60	108 million tons	10,000
Olinda Landfill (OC Sanitation)	29	123 million cubic yards	6,000
Lancaster Landfill (WMX)	70	9.2 million tons	1,700
Frank R. Bowerman Landfill (OC Sanitation)	60	N/A	8,500
Sunshine Canyon Landfill (BFI)	29	18 million tons	5,000
Mesquite Mine (WMX)	220	600 million tons	20,000
Potential Future Disposal Sites			
Railcycle (WMX)	180	n/a	n/a
La Paz, Arizona	220	n/a	no limit
Sunshine Canyon Landfill (BFI)*	29	73 million tons	11,000
Eagle Mountain	180	n/a	n/a

*Expansion permit

Impact on Disposal Costs

if direct-haul (Bradley Landfill and Sunshine Canyon Landfill) is not available

The current disposal costs include both transfer fees and tip fees at final disposal locations. If, as described above, the Bradley Landfill closes to the public and the Sunshine Canyon Landfill does not receive its expansion permit, the following scenario is highly probable:

The County of Los Angeles controls the operating permit under which the Sunshine Canyon Landfill is allowed to accept refuse. If the City does not issue the operating permit for the Sunshine Canyon Landfill to expand within City limits, it is likely that the County will place a moratorium on City disposal in the County portion of the landfill, which has taken place at both the Puente Hills and Scholl Canyon Landfills. This restriction will force the City to pay for transfer and transportation costs to haul our refuse to more distant disposal facilities.

In this scenario, all City-collected refuse (with the exception of West Valley) would pass through a transfer station, thereby significantly increasing our transportation costs. West Valley refuse can continue to be disposed at the Calabasas Landfill for the foreseeable future. At the same time, the decrease in competition for local refuse through the mergers and acquisitions in the waste management industry in the past year may serve to drive up prices for all disposal customers in Los Angeles County. This would be most significant for City residents, as the majority of the County-owned and operated landfills, which serve as a cost controlling factor for the region, are not available to any haulers from the City of Los Angeles.

Current refuse transfer and disposal fees are budgeted at \$25 million per year. In the most likely scenario, with the loss of local landfill capacity, the projected increase in refuse tipping fees would be over \$10.6 million per year, bringing the total for refuse transfer and disposal only to over \$35.6 million per year. In contrast, if the City can continue to dispose of its refuse at the Sunshine Canyon Landfill ***under the same contract price with CPI escalation*** for a significant term of 15-20 years or more, the increase in disposal fees would be strictly limited to CPI and population factors. Also, the City would not incur the capital cost of developing a new transfer station in the San Fernando Valley.

**Comparison of Current Refuse Disposal Costs and
Projected Costs if local disposal is not available**

Current Costs	East Valley	West Valley	Western	North Central	South Central	Harbor
Disposal Cost (per ton)	\$21.08	\$19.96	\$19.33	\$18.89	\$18.89	\$18.89
Tonnage (per month)	15,700	11,300	10,700	15,100	15,300	4,000
Subtotal (cost per month)	\$330,956	\$225,548	\$206,831	\$285,239	\$289,017	\$75,560
Transfer Cost (per ton)	N/A	N/A	\$17.75	\$17.75	\$17.75	\$17.04
Tonnage (per month)	N/A	N/A	2,343	15,100	15,300	4,000
Subtotal (cost per month)	N/A	N/A	\$41,588	\$268,025	\$271,575	\$68,160
TOTAL CURRENT COST (per month)	\$330,956	\$225,548	\$248,419	\$553,264	\$560,592	\$143,720
Inflated to reflect 2001-2 Fiscal Year	\$360,742	\$245,847	\$270,777	\$603,058	\$611,045	\$156,655
Projected Future Costs						
Disposal Cost (per ton)	\$24.00	\$27.00	\$24.00	\$24.00	\$24.00	\$24.00
Transfer Cost (per ton)	\$22.62	\$0.00*	\$22.62	\$22.62	\$22.62	\$22.62
Tonnage per month	15,700	11,300	10,700	15,100	15,300	4,000
TOTAL COST	\$731,895	\$305,100	\$498,807	\$703,924	\$713,248	\$179,000
Increase over current system	\$371,153	\$59,253	\$228,030	\$100,866	\$102,202	\$22,345
TOTAL PROJECTED INCREASE PER YEAR				\$10,606,198		

Average costs/fees from August-November 1998

*The Calabasas Landfill can continue to accept refuse from this district



Proposed Project Impacts (Excluding Closure Activities)

Legend

PLANT COMMUNITY	ACRES
Arroyo Willow Series	2.6
Mulefat Scrub	0.3
Coast Live Oak Woodland	0.0
Coast Live Oak Woodland	31.3
California Black Walnut Woodland	0.3
Venturan Coastal Sage Scrub	82.2
Chamise Chaparral	5.3
Big-cone Douglas Fir Forest	2.7
Nonnative Grassland	8.5
Ornamental	0.7
Mitigation Area	0.3
Existing Landfill	124.5
Closure Activities (Inactive landfill)	
Landfill Footprint Boundary	
TOTAL	258.7



Source: L & L Environmental
Tierra Madre Consultants



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Table 2.3-1 (Revised)
REMAINING PERMITTED DISPOSAL CAPACITY OF EXISTING SOLID
WASTE DISPOSAL FACILITIES IN THE COUNTY OF LOS ANGELES
December 31, 1995

Landfill Facility	Solid Waste Facility Permit (SWFP)	Facility Location	Operation Days/ Week	December 31, 1995 SWFP Daily Capacity (tons)	LUP Daily Capacity (tons)	1995 Average Daily Disposal 6 Days/Week (tons)			Quantity of MSW In 1995 (million tons)			Estimated Remaining Permitted Capacity (Effective Dec. 1995)		Comments
						Source			Source			Million Tons	Million Cubic Yards ^(a)	
						In-County	Out-of-County	Total	In-County	Out-of-County	Total			
Class III Landfill Facilities														
Antelope Valley	19-AA-0009	Palmdale	7	1,400 (b)	—	553	—	553	0.17	—	0.17	2.13	3.55	Proposed expansion not fully permitted as of 1/1/97.
Azusa Land Reclamation	19-AA-0013	Azusa	6	6,000 ^(b)	—	1,430	157	1,587	0.45	0.05	0.50	5.00	1.29	Closed
DKK	19-AF-0001	West Covina	5	12,000	—	8,587	1,206	9,793	2.68	0.38	3.05	2.65	4.42	Closed
Bradley West	19-AF-0008	Los Angeles	6	7,000	—	4,055	9	4,604	1.27	0.003	1.27	7.64	10.91	LUP expires 4/13/2007. ^(c)
Brand Park	19-AA-0006	Glendale	5	102	—	28	—	28	0.009	—	0.009	0.59	0.99	Limited to City of Glendale Dept. of Public Works use only.
Burbank	19-AA-0040	Burbank	5	240	—	132	—	132	0.041	—	0.041	6.36	10.60	Limited to City's use only.
Calabasas	19-AA-0056	Unincorporated	6	3,500	—	1,833	326	2,159	0.57	0.10	0.67	15.06	30.12	Limited to the Calabasas watershed only.
Chiquita Canyon	19-AA-0052	Unincorporated	7	5,000	—	1,236	153	1,389	0.39	0.048	0.43	1.88 ^(d)	2.78	LUP expires 2019 ^(d)
Lancaster	19-AA-0050	Lancaster	6	1,000	—	328	264	593	0.10	0.083	0.18	0.47	0.69	Approximate closure date 4/98.
Lopez Canyon	19-AA-0020	Los Angeles	5	7,000	7,000	2,968	—	2,968	0.98	—	0.98	0.57	0.83	Closed
Pebble Beach	19-AA-0061	Unincorporated	6	33	—	8	—	8	0.003	—	0.003	0.042	0.07	Facility annual average capacity is 49 tpd.
Puente Hills	19-AA-0053	Unincorporated	6	13,200	13,200	10,150	7	10,157	3.17	0.002	3.17	29.33	62.40	LUP limits to 72,000 tons per week. LUP expires 11/01/2003. No wastes from City of Los Angeles or Orange County.
San Clemente	19-AA-0063	Unincorporated	2	1.5	—	2	—	2	0.0006	—	0.0006	0.048	0.38	Landfill owned and operated by the U.S. Navy.
Scholl Canyon	19-AA-0012	Glendale	6	3,400	—	1,448	0.39	1,448	0.45	0.0001	0.45	10.91	22.73	Limited to the Scholl Canyon watershed only.
Spadra	19-AA-0015	Unincorporated/Pomona	6	3,700	—	2,064	158	2,222	0.64	0.049	0.69	2.12	5.00	LUP limits to 15,000 tons per week. No wastes from City of Los Angeles or Orange County. ^(e)
Sunshine Canyon	19-AA-0053	Unincorporated	6	6,600	6,600	—	—	—	—	—	—	16.90	23.72	Facility began accepting waste for disposal on 8/5/96. ^(f)
Two Harbors	19-AA-0062	Unincorporated	5	—	—	0.35	—	0.35	0.0001	—	0.0001	—	—	Facility closed 9/30/95.

Table 2.3-1 (Revised - Cont.)
REMAINING PERMITTED DISPOSAL CAPACITY OF EXISTING SOLID
WASTE DISPOSAL FACILITIES IN THE COUNTY OF LOS ANGELES
December 31, 1995

Landfill Facility	Solid Waste Facility Permit (SWFP)	Facility Location	Operation Days/ Week	December 31, 1995 SWFP Daily Capacity (tons)	LUP Daily Capacity (tons)	1995 Average Daily Disposal 6 Days/Week (tons)			Quantity of MSW in 1995 (million tons)			Estimated Remaining Permitted Capacity (Effective Dec. 1995)		Comments
						Source			Source			Million Tons	Million Cubic Yards ⁽¹⁾	
						In-County	Out-of-County	Total	In-County	Out-of-County	Total			
Whittier (Savage Canyon)	19-AH-0001	Whittier	6	350	—	232	—	232	0.0724	—	0.072	2.66	4.44	Limited to the City of Whittier use only.
Total				67,527		35,048	2,281	37,328	10.93	0.71	11.68	102.31	187.92	

Source: Los Angeles County Department of Public Works, Environmental Programs Division, *Los Angeles Countywide Siting Element, Volume I: The Element*, Table 4-3. June 1997.


Notes:

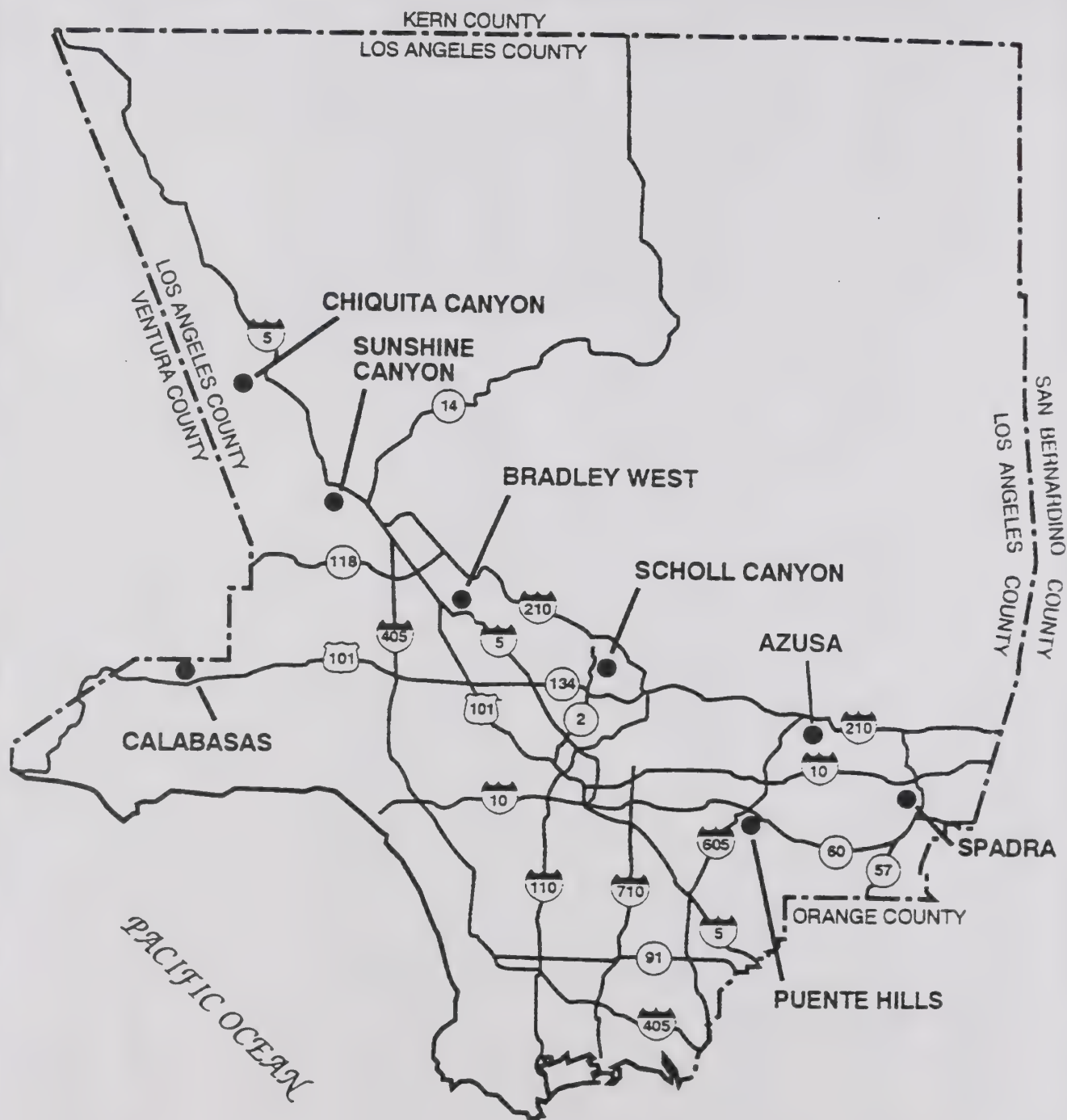
1. Disposal quantities are based on actual tonnages reported by landfill owners/operators to the DPW as part of monthly monitoring reports and/or solid waste management fee invoice payments and a written survey conducted by the DPW.
2. Estimated remaining permitted capacity based on landfill owner/operator responses to a written survey conducted by the DPW, as well as a review of site-specific permit criteria established by local land use agencies, LEAs, LARWQCB, and SCAQMD.

Footnotes:

- (a) Conversion factor based on in-place solid waste density, if provided by landfill operators; otherwise, a conversion factor of 1,200 pounds/cu. yd. was used.
- (b) Antelope Valley Landfill's daily capacity of 1,400 tpd is based on the SWFP issued on 12/26/95.
- (c) The Bradley West Landfill is anticipated to reach capacity in the year 2000, as stated in the revised SWFP 19-AR-0008, Bradley West Landfill and West Extension, p. 1, August 13, 1996.
- (d) The Chiquita Canyon Landfill has recently obtained a land use permit that provides for an anticipated disposal capacity of 23 million tons.
- (e) The Spadra Landfill is anticipated to close in 1999 as stated in the *Preliminary Draft County Countywide Siting Element*, p. 3-32, January 1996.
- (f) The Sunshine Canyon Landfill (County) is anticipated to reach capacity in 2006, based on landfill operations in the current footprint area.

Abbreviations:

LARWQCB	Los Angeles Regional Water Quality Control Board
DPW	Los Angeles County Department of Public Works
LEA	Local Enforcement Agency
LUP	Land Use Permit
MSW	Municipal Solid Waste
SCAQMD	South Coast Air Quality Management District
SWFP	Solid Waste Facilities Permit
tpd-6	Tons per day, 6 days/week
	Denotes closed landfill facilities (i.e., Azusa, BKK, and Lopez Canyon Landfills)



Legend

- Existing Class III Landfill

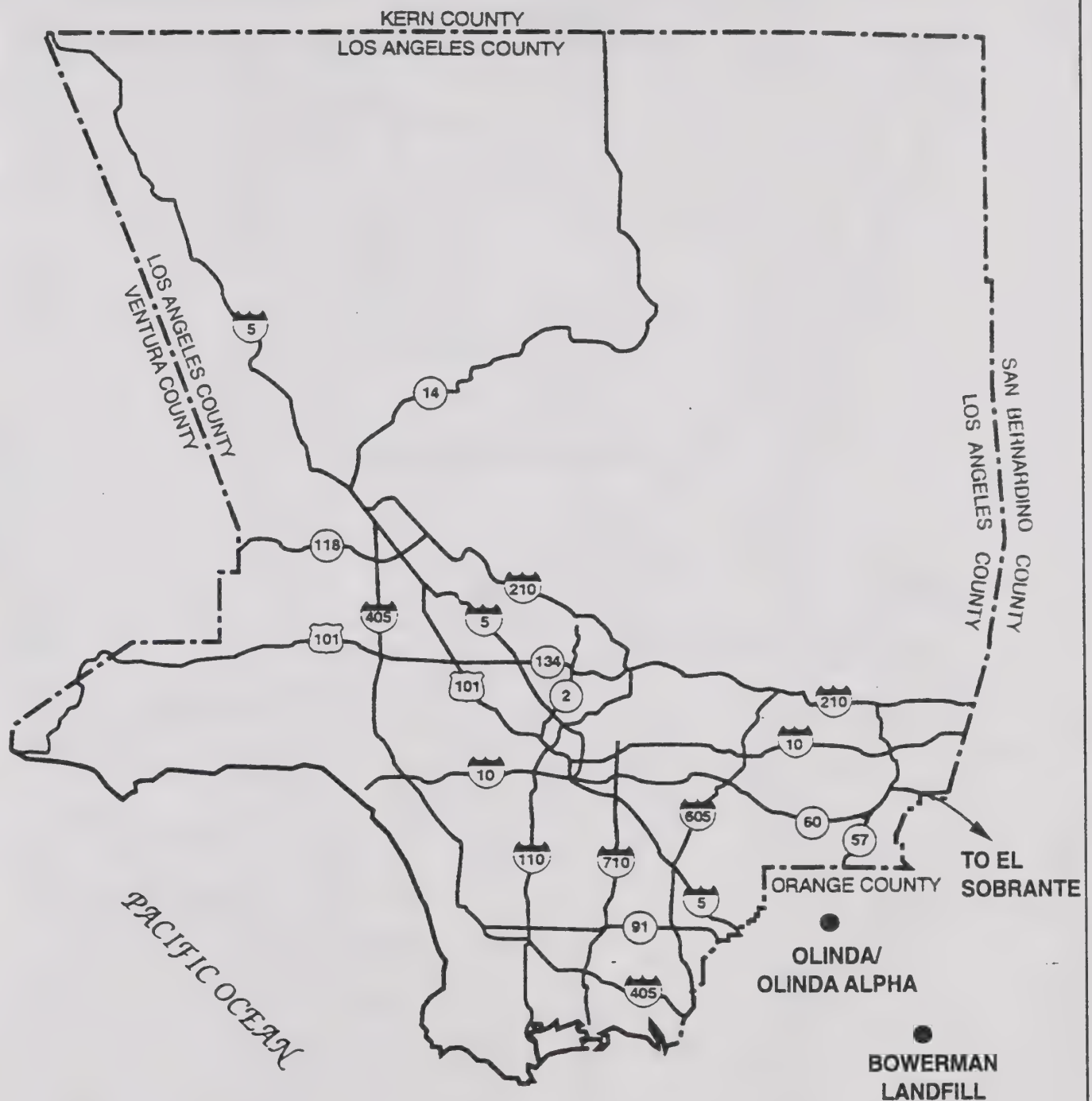
Source: Ultrasonics Environmental Incorporated
Sanitation Districts of Los Angeles County



Not to Scale



**Existing Landfills
in Los Angeles County**



Legend

- Existing Class III Landfill

Source: Ultrasonics Environmental Incorporated
Sanitation Districts of Los Angeles County

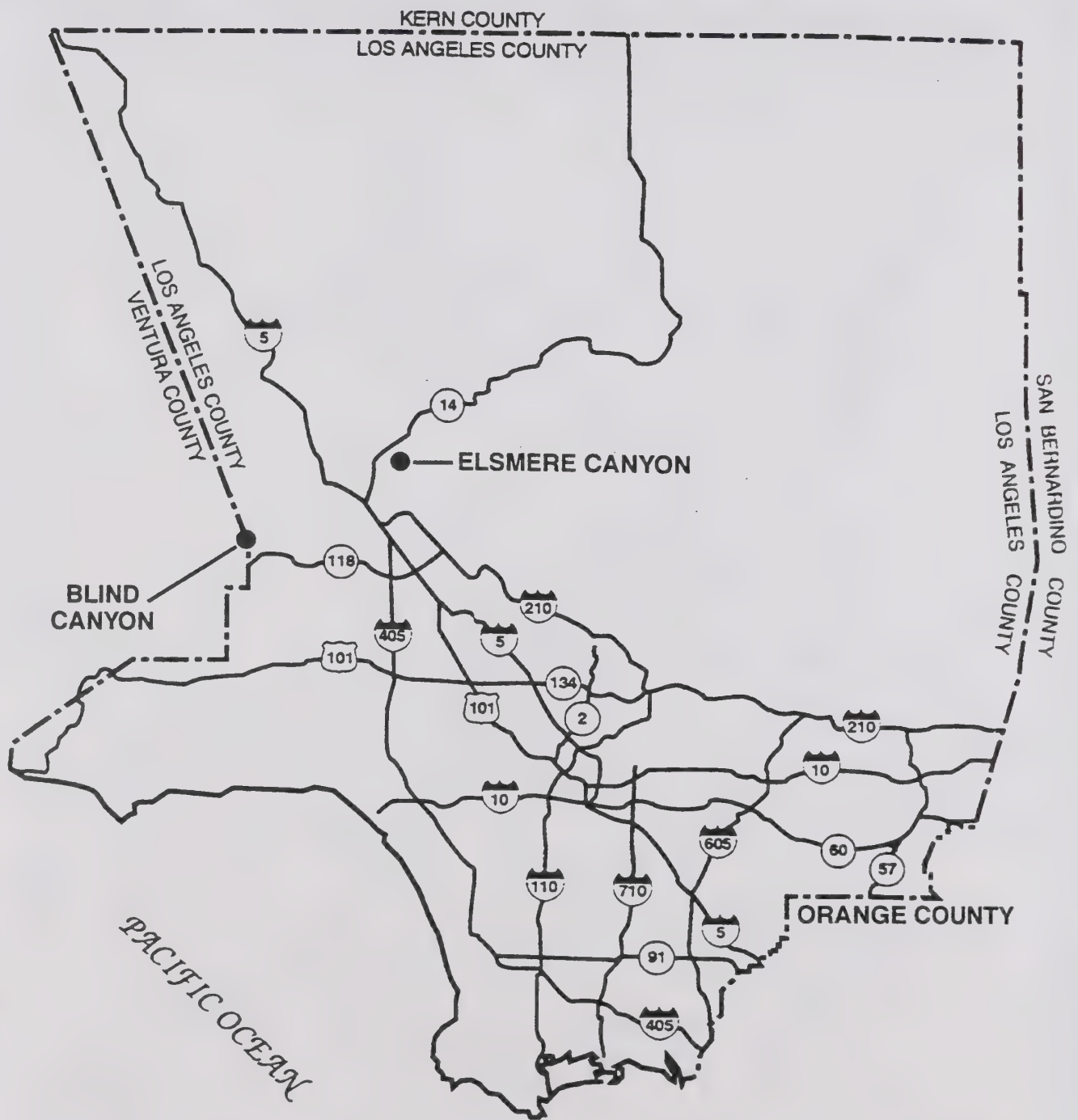


Not to Scale

PRIMA
DESHECHA ●
LANDFILL



Out-of-County Landfills that Could Accept City and County of Los Angeles Generated Solid Wastes



Legend

- Potential Landfill Development

Source: Ultrasystems Environmental Incorporated
Sanitation Districts of Los Angeles County



Not to Scale



ULTRASYSTEMS
ENVIRONMENTAL
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Potential Landfills in Los Angeles County

LIST OF SEIR ACRONYMS AND ABBREVIATIONS AND GLOSSARY OF TERMINOLOGY

A			
AAQS	Ambient Air Quality Standard	CFGC	California Fish and Game Code
A.B.	Assembly Bill	CFR	Code of Federal Regulations
ABS	acrylic butyl styrene	CHP	California Highway Patrol
ADCMs	Alternative Daily Cover Materials	CHSC	California Health and Safety Code
ADT	average daily traffic	CiSWMP	City of Los Angeles Solid Waste Management Plan
a.m.	Ante Meridiem	CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
ANSI	American National Standards Institute	City	City of Los Angeles
APCD	Air Pollution Control District	City BOE	City of Los Angeles Department of Public Works, Bureau of Engineering
APN	Assessor Parcel Number		
AQMD	Air Quality Management District	CIWMB	California Integrated Waste Management Board
AQMP	Air Quality Management Plan	cm/sec	centimeters per second
ARB	Air Resources Board	CMA	Congestion Management Agency
ASTM	American Society for Testing and Materials	CMA	critical movement analysis
ASUCLA	Archaeological Survey, University of California at Los Angeles	CMP	Congestion Management Plan (Los Angeles County)
ATC	Authority to Construct	CNDDB	California Natural Diversity Data Base
ATSAC	automatic traffic surveillance and control	CNEL	community noise equivalent level
AT&SF	Atchison, Topeka, and Santa Fe Railway Company, Inc.	CNPS	California Native Plant Society
AVO	average vehicle occupancy	CO	carbon monoxide
		CoIWMF	County of Los Angeles Integrated Waste Management Plan
B		Corps	U.S. Army Corps of Engineers
BACT	best available control technology	Conservancy	Santa Monica Mountains Conservancy
BFI	Browning-Ferris Industries of California, Inc.	CoSWMP	County of Los Angeles Solid Waste Management Plan
BLM	U.S. Bureau of Land Management	County	County of Los Angeles
BMP	best management practice	County DPW	County Department of Public Works
Board	Los Angeles County Board of Supervisors	cp	candlepower
BOE	Board of Equalization (State)	CPA	Community Planning Area
C		CPC	City Planning Commission
°C	degrees Celsius	CPR	cardiopulmonary resuscitation
CAA	Clean Air Act (Federal)	CSE	Countywide Siting Element (County of Los Angeles)
CAAQS	California Ambient Air Quality Standards	CSP	corrugated steel pipe
Cal-EPA	California Environmental Protection Agency	cu. ft.	cubic feet
Cal/OSHA	California Occupational Safety and Health Administration	cu. ft./sec	cubic feet per second
Caltrans	California Department of Transportation	cu. yd.	cubic yard(s)
CAP	Corrective Action Program	cu. yd./sq. mi.	cubic yard per square mile
CAPCOA	California Air Pollution Control Officers Association	CUP	Conditional Use Permit
CARB	California Air Resources Board	CWA	Clean Water Act
CCAA	California Clean Air Act (Sher Bilt) Stats. 1988, Ch. 1568	CWC	California Water Code
CCR	California Code of Regulations	D	
cd	candela	dB	decibel
CDFG	California Department of Fish and Game	dba	decibels on an A-weighted scale
CDMG	California Department of Natural Resources, Division of Mines and Geology	dbh	diameter breast high
CEQA	California Environmental Quality Act	DEIR	Draft Environmental Impact Report
CESA	California Endangered Species Act	DHS	Department of Health Services (County of Los Angeles)
		DPEIR	Draft Program Environmental Impact Report
		DPR	Department of Parks and Recreation (California)
		DPW	Department of Public Works (City/County of Los Angeles)

DTSC	Department of Toxic Substance Control
DWP	Department of Water and Power (City of Los Angeles)
DWR	Department of Water Resources (City of Los Angeles)

E

EAF	Environmental Assessment Form/Worksheet
EB	eastbound
ECDC	East Carbon Development Company
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ERS	Environmental Review Section (Department of City Planning)
ESA	Endangered Species Act
ESAC	Environmental Study Advisory Committee

F

°F	degrees Fahrenheit
FAR	floor area ratio
fc	footcandle
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIP	Federal Implementation Plan
FIRM	Flood Insurance Rate Map
FLPMA	Federal Land Policy and Management Act
FML	flexible membrane liner
FOC	Finding of Conformance
FR	Federal Register
ft.	foot (or feet)
FTE	full-time equivalent
Fwy.	Freeway

G

GCL	geosynthetic clay liner
GMA	Growth Management Area
GMP	Growth Management Plan
GPA	General Plan Amendment
GPA/ZC	General Plan Amendment/Zone Change
gpd	gallons per day
gpm	gallons per minute

H

hc	hydrocarbons
HCL	hydrochloric acid
HCM	Highway Capacity Manual (1994)
HDPE	high-density polyethylene
HELP	Hydrologic Evaluation of Landfill Performance
HHW	household hazardous waste
HHWE	Household Hazardous Waste Element
HHWMP	Household Hazardous Waste Management Plan

I

I	Interstate (Federal Highway)
ICU	intersection capacity utilization
IIP	Injury and Illness Prevention
IMF	intermodal facility
ITE	Institute of Traffic Engineers
IWMTF	Integrated Waste Management Task Force

K

km	kilometer
kV	kilovolt
kWh	kilowatt hours

L

LA	Los Angeles
LACSD	Los Angeles County Sanitation Districts
LADOT	City of Los Angeles Department of Transportation
LAFCO	Local Agency Formation Commission
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
lb	pound(s)
LCRS	leachate collection and removal system
Ldn	day-night (average) noise level
LDPE	low density polyethylene
LEA	Local Enforcement Agency
Leq	equivalent noise level
LFG	landfill gas
LLRW	low level radioactive waste
LOS	Level of Service
LTF	Local Task Force
LUE	land use element
LUP	Land Use Permit, and Land Use Plan

M

m	meter
M	magnitude; million
m ³	cubic meter
MAF	million acre-feet
MCE	maximum credible earthquake
Mcfd	million cubic feet per day
mg	milligrams
mg/m ³	milligrams per cubic meter
mg/l	milligrams per liter
MHA	maximum horizontal acceleration
μg/m ³	micrograms per cubic meter
μmhos/cm	micromhos per centimeter
mm	millimeter
mo	month
MOU	Memorandum of Understanding
MPE	maximum probable earthquake
mpg	miles per gallon
mph	miles per hour
MRC	Mine Reclamation Corporation
MRF	Material Recovery Facility

MRMP	Mitigation Reporting and Monitoring Program	psi	pounds per square inch
MRZ	Mineral Resource Zone	PTO	Permit to Operate
mscf	million standard cubic feet	PUC	Public Utilities Commission
msl	mean sea level	PVC	polyvinyl chloride
MSW	municipal solid waste	PZC	Planning and Zoning Code (City)
MSWLF	municipal solid waste landfill facility		
MTA	Metropolitan Transportation Authority	Q	
MW	megawatts	QA	quality assurance
MWD	Metropolitan Water District of Southern California	QC	quality control
		R	
N		RCE	Registered Civil Engineer
NAAQS	National Ambient Air Quality Standards	RCP	reinforced concrete pipe
NB	northbound	RCPG	Regional Comprehensive Plan and Guide
NCCP	Natural Community Conservation Plan	RCRA	Resource Conservation and Recovery Act
NDDDB	Natural Diversity Data Base	RDF	refuse-derived fuel
NDFE	Nondisposal Facility Element	RDSI	Report of Disposal Site Information
NDIR	nondispersive infrared spectroscopy	RFI	Report of Facility Information
NEPA	National Environmental Policy Act	RGA	Rule of General Application
NHPA	National Historic Preservation Act	RME	Regional Mobility Element
NO	nitric oxide	RMP	Regional Mobility Plan
NO ₂	nitrogen dioxide	ROC	reactive organic compound
NOC	Notice of Completion	ROG	reactive organic gases
NOD	Notice of Determination	ROW	right-of-way
NOEC	Notice of Early Consultation	ROWD	Report of Waste Discharge
NOI	Notice of Intent	RPC	Regional Planning Commission (County of Los Angeles)
NOP	Notice of Preparation	RPF	Registered Professional Forester
NO _x	nitrogen oxides	RWD	Report of Waste Discharge
NPDES	National Pollutant Discharge Elimination System	S	
NRHP	National Register of Historic Places	S.B.	Senate Bill
O		SB	southbound
O ₃	ozone	SCAB	South Coast Air Basin
OHWM	ordinary high water mark	SCAG	Southern California Association of Governments
OISWMD	Office of Integrated Solid Waste Management District	SCAQMD	South Coast Air Quality Management District
OPR	Office of Planning and Research State Clearinghouse	SCE	Southern California Edison Company
OSHA	Occupational Safety and Health Administration	SCEC	Southern California Earthquake Center
P		SCF	standard cubic feet
Pb	lead	scf/day	standard cubic feet per day
PCE	passenger car equivalents; perchloroethylene	scf/min	standard cubic feet per minute
PE	polyethylene	SCGC	Southern California Gas Company (now The Gas Company)
PET	polyethylene terephthalate	SCRRA	Southern California Regional Rail Authority
PGA	peak ground acceleration	SCS	U.S. Soil Conservation Service
p.m.	Post Meridiem	SDWS	Secondary Drinking Water Standards
PM ₁₀	particulate matter (less than 10 microns in diameter)	SEA	Significant Ecological Area
ppb	parts per billion	SEIR	Subsequent (or Supplemental) Environmental Impact Report
ppm	parts per million	SIP	State Implementation Plan
ppt	parts per thousands	SO ₂	sulphur dioxide
PRA	Purcell, Rhodes, and Associates	SO _x	sulphur oxide
PRC	Public Resources Code	SPRR	Southern Pacific Railroad
		sq. ft.	square feet
		sq. mi.	square mile
		sq. yd.	square yard

SR	State Route
SRRE	Source Reduction and Recycling Element
SSZ	Special Study Zone
State	State of California
Subtitle D	40 CFR, Part 258, Subtitle D
SWAT	Solid Waste Assessment Test
SWFP	Solid Waste Facilities Permit
SWMC	Solid Waste Management Committee
SWMD	Solid Waste Management Department
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board

T

TAC	toxic air contaminant
TC	Transportation Corridor
TCE	trichloroethylene
TCM	transportation control measures
TDM	Transportation Demand Management
TDS	total dissolved solids
TE	trip end
TIA	traffic impact analysis
TLV	threshold limit value
TMC	Transit Mixed Concrete Company
tpd	tons per day
TSM	transportation systems management
TSP	total suspended particulates
TSS	total suspended solids

U

UBC	Uniform Building Code
UCLA	University of California at Los

UPR	Angeles Union Pacific Railroad
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
UZMP	Unsaturated Zone Monitoring Program

V

V/C	volume-to-capacity ratio
VCP	visual comfort probability
VMP	Verification Monitoring Program
VMT	vehicle miles traveled
VOC	volatile organic compound
VPD	vehicle (trips) per day
VPH	vehicle (trips) per hour
VT	vehicle trips

W

WB	westbound
WDR	Waste Discharge Requirements
WGCEP	Working Group on California Earthquake Probabilities
WIP	Well Investigation Program
WTE	waste-to-energy

Y

yd.	yard or yards
yd ³	cubic yard(s)
yr.	year

Z

ZC	zone change
ZV	zone variance

GLOSSARY OF TERMINOLOGY

<u>A</u>	
A-Weighting	A scale applied to sound level measurements in decibels; corresponds approximately to human hearing sensitivity. Expressed as dBA.
Action Plan	Los Angeles County Solid Waste Management Action Plan was adopted by the Los Angeles County Board of Supervisors on April 5, 1988. It provides policies for the integrated management of solid wastes in the County.
Active Fault	Geologic fault with recent seismic activity that displaced materials not more than 12,000 years old.
Active Working Face	The working surface of a landfill upon which solid wastes are deposited during the landfill operation prior to the placement of cover material.
Aerobic	Living, active, or occurring only in the presence of oxygen.
Agricultural Waste	Solid wastes of plant and animal origin that result from the production and processing of farm or agricultural products, including manures, orchard and vineyard prunings, and crop residues, which are removed from the site of generation for solid waste management.
Air Basin	A regional area designated by the Air Resources Board for air quality planning purposes.
Air Monitoring	Sampling and measuring air pollutants present in the ambient air.
Air Pollutant	A material in the ambient air that produces air pollution. Common air pollutants are ozone (O ₃), nitrogen dioxide (NO ₂), particulate matter (PM ₁₀), sulfur dioxide (SO ₂), and carbon monoxide (CO). Air pollution is defined in the California Health and Safety Code as any discharge, release, or other propagation into the atmosphere and includes, but is not limited to, smoke, charred paper, dust, soot, grime, carbon, fumes, gases, odors, particulate matter, acids, or any combination thereof.
Air Pollution Control District	A regional governmental body responsible for attainment and management of air quality standards through permitting and regulating the emission sources.
Air Quality Management Plan (AQMP)	A document that describes how the SCAQMD plans to achieve federal and state air quality standards. In the spring of 1989 the District Board adopted an AQMP that was amended in 1991 and again in 1994. The Plan proposes a course of action designed to achieve the national clean air standards, with an implementation schedule of new District rules. In addition, the plan contains proposals for regulations from the California Air Resources Board, the federal government, and local government.
Air Space	The vertical and horizontal space extending from surface level upward in elevation over a particular area of land.
Aluminum Can or Aluminum Container	Any food or beverage container composed of at least 94 percent aluminum.
Alluvial Soils	Soils developed from transported and relatively recently deposited material (alluvium) with little or no modification of the original materials by soil forming processes.
Ambient	An encompassing atmosphere or body of water.
Ambient Air Quality Standard (AAQS)	Clean air standards developed by the USEPA and the California Air Resources Board to measure the level of air contamination that is not to be exceeded in order to protect human health.

Ambient Noise Level	Noise levels from all sources, including near and far. This type of noise level constitutes the normal or existing level of environmental noise at a given location.
Anaerobic Decomposition	The biochemical decomposition of organic substances in the absence of oxygen.
Applicant	A person or entity who proposes to carry out a project that needs a lease, permit, license, certificate, or other entitlement for use or financial assistance from one or more public agencies when that person or entity applies for governmental approval or assistance.
Approval	The decision by a public agency that commits the agency to a definite course of action in regard to a project intended to be carried out by any applicant. The exact date of approval of any project is a matter determined by each public agency according to its rules, regulations, and ordinances. Legislative action in regard to a project often constitutes approval.
Aquifer	A water-bearing stratum of permeable rock, sand, or gravel.
Assembly Bill 939 (A.B. 939)	<p>The California Integrated Waste Management Act of 1989. This Act repealed the California Solid Waste Management Resource Recovery Act of 1972 and the California Solid Waste Control Act of 1976 in their entirety and comprehensively reorganized the state solid waste management planning process.</p> <p>The act creates a four-part structure. First, it creates the California Integrated Waste Management Board, a six-member, full-time board, replacing the nine-member, part-time waste board. Second, it replaces the old scheme with a new, integrated waste management planning process, including recycling goals for cities and counties. Third, it strengthens the certification criteria and performance standards for local enforcement agencies. Fourth, it reorganizes and consolidates several existing laws, with minor modifications, into the Public Resources Code.</p> <p>The recited purposes of the act are to reduce, recycle, and reuse solid waste generated in the state; conserve natural resources; and protect air and water quality. It is also intended to improve the regulation of existing solid waste landfills, ensure that new solid waste landfills are environmentally sound, improve permitting procedures for solid waste management facilities, and specify the responsibilities of local governments to develop and implement integrated waste management programs.</p>
At-Grade Crossing	The crossing of two channels of transportation at the same elevation or level.
Authority to Construct	A permit required by the local air quality regulatory agency (SCAQMD) prior to the construction of a major emission source.
Average	In terms of a measurement, the sum of the measurements (included over a specified period) divided by the number of measurements.
Average Daily Traffic (ADT)	The number of vehicles passing a given point on a road going in one direction during a 24-hour period.
<u>B</u>	
Baseline	A set of existing conditions against which change is to be described and measured.
Baseline Groundwater Monitoring	Measure of groundwater quality prior to initiating a project for the purpose of having a standard for future comparisons.
Bedrock	The solid rock beneath the soil and subsoil.
Berm	An earthen structure, generally several feet high, that redirects the flow of water. Typically, a ledge at the top of bottom of a slope.
Best Available Control Technology (BACT)	Under SCAQMD rules, BACT is defined as the most stringent emissions control that, for a given class of source, has been (1) achieved in practice, (2) identified in a state implementation plan, or (3) found by the SCAQMD to be technologically achievable and cost-effective.

Biota	Living organisms.
Btu	British thermal unit. A measurement of energy and the amount of energy that can be obtained as heat by combusting approximately 1/1000 cubic foot of natural gas.
Buildout Year	The year in which the project construction has been completed and the project site is ready to be occupied.
Buyback Recycling Center	A facility where specific recyclable materials are purchased from the public and then delivered for the purpose of recycling or composting.
<u>C</u>	
California Clean Air Act	A law setting forth a comprehensive program to assure that all areas within the State of California will attain federal and state ambient air quality standards by the earliest practicable date. Also known as the Sher Bill or A.B. 2595, the law mandates comprehensive planning and implementation efforts, and empowers local districts to adopt transportation control measures and indirect source control measures to achieve and maintain ambient air quality standards. The law provides annual emission reduction targets and regular review and evaluation of local programs by the California Air Resources Board.
California Endangered Species Act	California enacted legislation in 1984 designed to protect species from extinction and protect their habitat from destruction; impose planning responsibilities on state agencies and their licenses or permittee; prohibit commercial trade or activities of endangered species alive or dead, or of their parts or products made from the species; and prohibit people from killing or taking endangered species.
California Environmental Quality Act (CEQA)	CEQA is known as California's broadest environmental law, enacted by the state legislature in 1970 and amended thereafter. The six key objectives of CEQA are to disclose to decision-makers and the public the significant environmental effects of proposed activities, identify ways to avoid or reduce environmental damage, prevent environmental damage by recommending implementation of feasible alternatives or mitigation measures, disclose to the public reasons for agency approvals of projects with significant environmental effects, foster interagency coordination, and enhance public participation.
California Native Plant Society (CNPS) Rating Codes	System used to indicate the rarity, endangerment, and distribution of plant species on a scale of 1 to 3 (1 meaning wide distribution/not endangered and 3 meaning limited occurrence/endangered).
Carbon Dioxide	A colorless gas whose chemical formula is CO ₂ . It enters the atmosphere as the result of natural and artificial combustion processes and is also a normal part of the ambient air.
Carbon Monoxide	An invisible, odorless, tasteless, and toxic gas; its chemical formula is CO. It is primarily generated by motor vehicles but is found in trace quantities in the natural atmosphere.
Cell	That portion of compacted solid wastes in a landfill that is enclosed by natural soil or cover material during a designated period.
Certification	Certification refers to the Lead Agency's determination that an EIR has been completed in compliance with CEQA and was reviewed and considered by the Lead Agency's decision-making body before it approved the project.
Class III Landfill	Landfill permitted to accept nonhazardous solid waste materials.
Closure	Termination of waste discharges at a landfill and operations necessary to prepare the closed unit for postclosure maintenance.
Colluvium	Mixed deposit of soil material and rock fragments accumulated near the base of steep slopes through soil creep, slides, and local wash.
Commercial Solid Wastes	All types of solid wastes generated by stores, offices, and other commercial sources.
Community Noise Equivalent Level (CNEL)	The averaging of noise levels on a measurement scale of decibels that increases the actual noise measurement to account for an increased sensitivity to noise during late evening, nighttime, and morning hours.

Community Plan/District Plan	A portion of the local general plan that focuses on a particular area or community within the City or County. Community plans supplement the policies of the General Plan.
Compactor Truck	A refuse collection vehicle that hydraulically compresses waste materials within the body of the truck.
Compactors	A type of trash container that can be moved on and off a rolloff truck. These containers have the capability of hydraulically compressing materials within the container.
Composite Liner	A liner consisting of two layers of materials, usually clay and synthetic, designed to protect groundwaters by acting as a barrier to leachate and gas migration.
Composting	A controlled microbial degradation of organic wastes yielding a safe and nuisance-free product.
Congestion	Traffic conditions on roads, highways, or freeways that do not permit movement on these infrastructure facilities at optimal legal speeds. Characterized by unstable traffic flows.
Congestion Management Program (CMP)	A state-mandated program for counties containing urbanized areas to provide for statutorily specified programs to reduce traffic congestion.
Construction and Demolition Wastes	Waste building materials, packaging, and rubble resulting from construction, remodeling, repair, and demolition operations on pavements, houses, commercial buildings, and other structures.
Corridor	A broad geographical band that follows a general directional flow or connects major sources of trips. It may contain a number of streets and highways and transit lines and routes.
Cover Material	Soil or other material suitable for use in covering compacted solid wastes in a disposal site.
Criteria Pollutants	Air pollutants for which the federal or state governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.
Cultural Resources	Places, objects, or other physical evidence associated with human activity important to a culture or a community for scientific, traditional, or religious reasons. This document includes the disciplines of archaeological, paleontological, and historical resources.
Cumulative Impacts	Cumulative impacts are two or more individual impacts on the environment that, when considered together, "are considerable" or that compound or increase other environmental impacts.
Curbside Collection	Collection at individual households or commercial buildings by municipal or private haulers for processing and recycling.
Cut-and-Fill Limits	Delineation between existing undisturbed terrain and areas of excavation or engineered fills.
<u>D</u>	
Daily Cover	Cover material spread and compacted on the entire surface of the active working face of the sanitary landfill at least at the end of each operating day in order to control vectors, fire, water infiltration and erosion, and to prevent unsightliness.
Decibel (dB)	A unit for expressing the relative intensity (loudness) of sounds. The decibel is the logarithm of the ratio of the intensity of a given sound to the faintest sound discernible by the human ear.
Decibel, A-Weighted (dBA)	Decibel unit scale modified to represent the relative sensitivity of the human ear to low-pitched sounds.
Decision-Making body	Any person or group of people within a public agency permitted by law to approve or disapprove the project at issue.

Decomposition	The chemical breakdown of organic substances into constituent parts or elements. The decomposition of waste materials occurs inside a landfill.
Decomposition Gases	Gases produced by chemical or microbial activity during the decomposition of solid waste.
Dendritic Drainage	The form of the drainage pattern of a stream and its tributaries when it follows a tree-like shape, with the main trunk, branches, and twigs corresponding to the main stream, tributaries, and subtributaries, respectively, of the stream.
Detention Basin	A surface feature designed to control the peak discharge rate of rainfall runoff.
Diameter at breast height at the high-side (dbh)	The diameter of a tree measured approximately 4½ feet from ground level. "Ground level" can follow two conventions: (1) the highest point of the ground touching the stem or (2) the mean of the highest and lowest points.
Discretionary	An action that requires the exercise of judgment or deliberation when the public agency or body decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances, or regulations.
Disposal Capacity	The capacity, expressed in either weight in tons or its volumetric equivalent in cubic yards, that is either currently available at a permitted solid waste landfill or will be needed for the disposal of solid waste generated within a jurisdiction.
Disposal Site	The location where any final treatment, utilization, processing, or deposition of solid waste occurs.
Dropoff Recycling Center	A facility that accepts delivery or transfer of ownership of source separated materials for the purpose of recycling or composting without paying a fee. Donation of materials to collection organizations, such as charitable groups, is included in this definition.
<u>E</u>	
Emission	Any unwanted substances that are released by human activity into air or water.
Emission Control Device	Any piece of equipment that reduces the release of air pollutants into the atmosphere.
Emission Factor	The rate at which pollutants are released into the atmosphere by one source or a combination of sources.
Emission Standard	The maximum amount of an emittant legally permitted to be discharged from a single source.
Emission Thresholds	An amount of emissions established by the SCAQMD, for use by local government planners, to compare with the emissions that could be emitted from a particular project to determine whether that project could have a significant impact on air quality.
Endangered Species	Species of plant or animal in danger of extinction throughout all or a significant portion of its range.
End Market or End Use	The use or uses of a diverted material or product that has been returned to the economic mainstream, whether or not this return is through sale of the material or product. The material or product can have a value that is less than the solid waste disposal cost.
Environment	The physical conditions existing within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is the area in which significant effects would occur either directly or indirectly as a result of the project.
Environmental Impact Report (EIR)	A detailed informational document prepared by a Lead Agency that analyzes a project's significant effects and identifies mitigation measures and reasonable alternatives. The purposes of an EIR are to inform decision-makers and the public about a project's environmental effects and ways to reduce them, demonstrate to the public that the environment is being protected, and ensure political accountability.

Epoch	A particular interval of geologic time marked by distinctive features, longer than an "age" and shorter than a "period." Used to organize a time scale of geologic history.
Equivalent Noise Level (Leq)	The average noise level, on an energy basis, for a stated period of time (e.g., hourly).
Erosion	The wearing away of the land surface by detachment and transport of soil and rock materials through the action of moving water, wind, or other geological agents.
Evapotranspiration	The discharge of water from the earth's surface to the atmosphere by evaporation from lakes, streams, and soil surfaces, and by transpiration from plants.
Extraction Well	A well designed for the removal of subsurface waters.
<u>F</u>	
Facultative Plants	Plants with a similar likelihood (estimated probability 33 to 67%) of occurring in both wetlands and nonwetlands.
Fault	A fracture in either soil or a rock mass along which movement has occurred, causing one side to be displaced in relation to the other, usually in a direction parallel to the fracture. Typically, abrupt movement on a fault is the cause of an earthquake.
Feasible and Feasibility	Capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.
Federal Drinking Water Standards	Primary water standards set in 1962 by the U.S. Public Health Service that are used in determining the suitability of water for drinking and culinary purposes. The standards establish mandatory limits of maximum permissible concentration for certain chemical constituents and nonmandatory but recommended limits for others.
Ferrous Metals	Metals that are predominantly composed of iron. These types of metals are easily identifiable by using a magnet. Examples include steel or "tin" cans, automobiles, and white goods.
Final Cover	Cover material that represents the permanently exposed final surface of the landfill.
Floodplain	A strip of relatively smooth land bordering a stream built of sediment carried by the stream and dropped in the slack water beyond the influence of the swiftest current in times of flood.
Fold	A bend in rock layers caused by compression of the earth's crust.
Foliation	A general term for a planar arrangement of textural or structural features in any type of rock. This term is most commonly applied to metamorphic rock.
Food Waste	All animal and vegetable solid wastes generated by food facilities or from residences that result from storing, selling, preparing, cooking, or handling food.
Footprint	The boundary of a waste disposal area.
Fossil Fuels	A general term for any hydrocarbon derived from the fossils of organisms (e.g., petroleum, natural gas, coal).
Front Loader	A refuse collection truck with two forks that extend from the front of the vehicle under the cab, 1- to 6-yard dumpsters can be placed on the forks, lifted over the cab and dumped into the top of the truck, which makes this type of truck effective for collecting trash from multiunit dwellings and commercial accounts. Has recycling applications as well. A compaction blade pushes the material toward the rear to fully utilize the truck's capacity. Usually operated by one person in residential routes; two people on commercial routes.

<u>G</u>	
g	The force of acceleration that is due to gravity, which is 32 feet per second squared.
Gas Collection System	A network of trenches, wells, piping, and vacuums used to collect landfill gases generated by the decomposition of waste materials. After gases are collected, they are transported to a central location on-site where they can be flared (burned) or treated and used as an energy source.
General Plan	California state law requires each city and county to adopt a comprehensive, long-term general plan that provides for the physical development of both the city and any land located outside the city's boundaries that it judges as related to its planning (Cal. Gov't. Code, § 65300).
Generator	A specific building, house, or establishment that creates solid waste.
Geotextile Filter	A synthetic cushion layer placed over the geomembrane component of a composite liner to protect the geomembrane from overlying coarse, granular materials used to construct a leachate collection and removal system.
Gleyed	A soil condition resulting from prolonged soil saturation that is manifested by the presence of bluish or greenish mottles (spots or streaks) among other colors. Gleying occurs under reducing conditions resulting from soil saturation by which iron is reduced predominantly to the ferrous state.
Global Warming	The gradual buildup of "greenhouse" gases that absorb energy and prevent it from passing into space. As a result, more solar energy is retained near the earth's surface than is lost into space, and the result is a general warming of the earth's atmosphere.
Grade	A term applied to a paper, pulp, or waste paper that is ranked on the basis of its use, appearance, quality, manufacturing history, raw materials, performance, or a combination of these factors. Some grades are officially identified and described; other grades are commonly recognized but lack official definition.
Green Waste	Generated from plant material, including, but not limited to, leaves, grass clippings, weeds, tree trimmings, untreated wood waste, and shrubbery cuttings.
Groundwater	All water below the land surface. It has its origin in the downward seepage of surface water to a layer of impervious material.
Groundwater Basin	Underground formation with sides and bottom of relatively impervious material in which groundwater is held or retained; it can be considered a hydrologic unit.
Groundwater Recharge	The process of replenishment of groundwater through infiltration and percolation of water from land areas or streams through permeable soils into aquifers.
Growth Management Plan (GMP)	A chapter contained in the <i>Regional Comprehensive Plan and Guide</i> developed by the Southern California Association of Governments that contains demographic projections (i.e., housing units, employment, and population) through the year 2015 for a six-county region (i.e., Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties). The plan also provides recommendations for local governments for growth and land use patterns that minimize development costs, save natural resources, and enhance quality of life.
<u>H</u>	
Habitat	The natural environment of a plant or animal.
Hazardous Wastes	Any waste material or mixture of wastes that is toxic, corrosive, flammable, an irritant, or a strong sensation that generates pressure through decomposition or heat (or other means) or causes substantial personal injury or illness.

High-Grade Paper	High-quality paper fibers that can be directly substituted for wood pulp; includes both pulp substitutes and de-inking grades.
Holocene Fault	An epoch of the Quaternary period, from the end of the Pleistocene (approximately 11,000 years to the present).
Household Hazardous Waste (HHW)	Any hazardous waste generated incidental to owning or maintaining a place of residence. HHW does not include any waste generated during the course of operating a business concern at a residence.
Hydraulic Conductivity	The capacity of a medium to transmit water, expressed as the volume of water at the prevailing temperature that will move in unit time under a unit hydraulic gradient through a unit area. The units for this term include gallons per day per square foot, or centimeters per second.
Hydric Soil	A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions that favor growth and regeneration of hydrophytic vegetation.
Hydrologic	Of or relating to the properties, distribution, and circulation of water on and below the earth's surface and in the atmosphere.
Hydrophytic Vegetation	The sum total of macrophytic plant life growing in water or on a substrate that is at least periodically deficient in oxygen as a result of excessive water content.
I	
Igneous Rock	Rock that resulted from the solidification of molten or partly molten material.
Impermeable	Having a texture that does not allow water to move through perceptibly.
Industrial Solid Wastes	All types of solid wastes and semisolid wastes that result from industrial processes and manufacturing operations.
Inert Solids or Inert Waste	A nonliquid solid waste including, but not limited to, soil, concrete, rocks, and bricks that does not contain hazardous waste or soluble pollutants at concentrations in excess of water-quality objectives established by a regional water board pursuant to Division 7 (commencing with § 13000) of the California Water Code and does not contain significant quantities of decomposable solid waste.
Inerts	Noncombustible, nondangerous solid wastes that are likely to retain their physical and chemical structure under expected conditions of disposal, including resistance to biological attack and chemical attack from acid rainwater. (See Inert Solids.)
Infiltration	The movement of water from the surface into the soil. Infiltration is equal to the total precipitation less the losses due to interception by vegetation, retention in the depressions upon the land surfaces, evaporation from all moist surfaces, and surface runoff.
Initial Study	An Initial Study is a Lead Agency's preliminary analysis of a project to determine whether it may have a significant adverse effect on the environment. If it may have such an effect, then an EIR is required. If it will not have such an effect, then the project can be approved under a Negative Declaration.
Intermediate Cover	Cover material that is applied on areas of the landfill where additional cells are not to be constructed for extended periods of time and therefore must resist erosion for a longer period of time than daily cover.
Intersection Capacity	The maximum number of vehicles that can pass through an intersection in one direction during a given time period under prevailing roadway and traffic conditions.
Intersection Capacity Utilization Method (ICU)	A method of analyzing intersection level of service by calculating a volume-to-capacity (V/C) ratio for each governing "critical" movement during a traffic signal phase. The V/C ratio for each phase is summed with the others at the intersection to produce an overall V/C ratio for the intersection as a whole. The V/C ratio represents the percent of intersection capacity utilized.
Intrusive Rocks	Rocks that have solidified at some distance beneath the surface of the Earth.

Inversion Layer	An atmospheric condition in which the air temperature increases with increasing altitude, holding cooler surface air down. Typically, pollutants tend to be trapped below the inversion.
ITE Generation Manual	A document produced by the Institute of Transportation Engineers that provides trip generation numbers by land use based on trip generation studies conducted nationwide.
<u>J</u>	
Jurisdiction by Law	The authority of any public agency to (1) grant a permit or other entitlement for use, (2) provide funding for the project in question, and (3) exercise authority over resources that may be affected by the project.
<u>L</u>	
Landfill	A disposal site using a method of disposing of solid wastes on land without creating nuisances or hazards to public health or safety by utilizing principles of engineering to confine the wastes to the smallest practical area, reduce them to the smallest practical volume, and cover them with a layer of suitable cover material at specific designated intervals.
Landfill Gas Condensate	Liquid from the landfill gas that results from the temperature decline of the gas as it is collected.
Landslide	The rapid downward movement of a mass of rock, earth, or artificial fill on a slope.
Leachate	Liquid that has come in contact with or percolated through waste materials and has extracted or dissolved contaminating substances from the waste.
Leachate Collection and Removal System (LCRS)	The drainage network above the landfill liner, and below waste disposal areas, utilized to collect any leachate generated by the disposed waste materials and convey it to a treatment or storage area.
Lead Agency	The public agency that has the principal responsibility for carrying out or approving a project. The Lead Agency decides whether an EIR or Negative Declaration will be required for the project and will cause the document to be prepared. (State CEQA Guidelines, § 15367).
Level of Service (LOS)	A measure of the congested level on a highway facility based primarily on the comparison between the facility's capacity and the traffic volume it carries. A qualitative measure of the effect of traffic flow factors such as special travel time, interruptions, freedom to maneuver, driver comfort, and convenience, and indirectly, safety and operating cost. Levels of service are usually described by a letter rating system of A through F, with LOS A indicating stable traffic flow with little or no delays and LOS F indicating excessive delays and jammed traffic conditions.
Liner	A continuous layer of natural or artificial materials or a continuous membrane of artificial material installed beneath or on the sides of a landfill that acts as a barrier to vertical or lateral fluid movement.
Liquefaction	A temporary transformation of a water-saturated soil or sediment into a fluid mass, ordinarily occurring during a seismic event.
Lithology	The science dealing with the physical character of rock.
Local Agency	A public agency other than a state agency, board, or commission. Local agencies include, but are not limited to, cities, counties, charter cities, districts, school districts, special districts, redevelopment agencies, local agency formation commissions, and any board, commission, or organizational subdivision of a local agency when so designated by order or resolution of the governing legislative body of the local agency.
Local Enforcement Agency	A locally designated city or county agency, acting as a representative of the California Integrated Waste Management Board, responsible for the inspection and monitoring of solid waste landfills.

Lysimeter	A device for measuring the percolation of water through soils and determining the soluble constituents removed in the drainage.
<u>M</u>	
Materials Recovery Facility (MRF)	A permitted solid waste facility where solid wastes or materials are sorted or separated by hand or mechanization for the purpose of recycling or composting.
Maximum Contaminant Level (MCL)	USEPA or State maximum contaminant levels for drinking water established under the National Primary Drinking Water Regulations.
Maximum Credible Earthquake (MCE)	The maximum earthquake capable of occurring under the presently known tectonic framework. It is a rational and believable event that is in accordance with all known geologic and seismologic facts.
Maximum Probable Earthquake (MPE)	The maximum earthquake that is likely to occur during a 100-year interval. It is to be regarded as a probable occurrence, not as an assured event that will occur at a specific time.
Metamorphic Rock	A rock that has been greatly altered from its previous condition through the combined action of heat and pressure.
Ministerial	A governmental decision involving little or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented and uses no special discretion or judgment in reaching a decision.
Mitigation Measure	An action or a modification of a project that is recommended by an EIR or a Negative Declaration to reduce or avoid some impact on the environment. Mitigation measures may include actions that avoid an impact altogether, minimize an impact, correct an adverse impact, reduce or eliminate an impact, or compensate for an impact by providing substitute resources or environments.
Mobile Sources	Those sources that emit pollution from vehicles. There are two types of mobile source emissions: those from on-road sources (e.g., passenger automobiles, trucks, busses, etc.) and off-road sources (e.g., airplanes, trains, construction equipment, etc.).
Mobility	A transportation system user characteristic referring to the ability of the user to take advantage of the available transportation service.
Mode	A particular form of travel (e.g., walking, automobile, train, etc.).
Monitoring Well	A well constructed for the purpose of sampling subsurface water for physical, chemical, or biological testing, or measuring water levels.
Municipal Solid Waste (MSW)	All solid wastes generated by residential, commercial, and industrial sources, and all solid waste generated at construction and demolition sites, food-processing facilities, and treatment works for water and waste water, which are collected and transported under the authorization of a jurisdiction or are self-hauled to Class III landfills. Most recyclable commodities fall under this category. MSW does not include agricultural crop residues, animal manures, mining and fuel extraction waste, forestry wastes, and ash from industrial boilers, furnaces, and incinerators. (See waste, waste stream.)
<u>N</u>	
Nitric Oxide	A colorless, odorless gas whose chemical formula is NO. Formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure.
Nitrogen Dioxide	A reddish-brown irritating gas whose chemical formula is NO ₂ . Formed by the combination of nitric oxide and oxygen, NO ₂ acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

Nitrogen Oxide	A combination of nitrogen-containing gases whose chemical formula is NO_x . Produced by combustion in the presence of nitrogen under high temperature and/or pressure, NO_x serves as an integral participant in the process of photochemical smog production. The two major forms of NO_x are nitric oxide (NO) and NO_2 .
Nonhazardous Solid Wastes	All putrescible and nonputrescible solid, semisolid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, and vegetable or animal solid and semisolid wastes.
Nonrecyclable Paper	Discarded paper that has no market value because of its physical, chemical, or biological characteristics or properties.
Nonrenewable Resource	A resource that cannot be replenished, such as those resources derived from fossil fuels.
Notice of Completion	A Notice of Completion is filed by a CEQA Lead Agency with the State Office of Planning and Research when it completes preparation of the Draft EIR and is prepared to send out copies for public review.
Notice of Determination	A brief notice (typically one page) that is filed by a public agency with the county clerk of the county in which the project will be located and the State Office of Planning and Research. The notice is posted in the office of the county clerk after the agency approves or determines to carry out a project that is subject to CEQA.

Q

Organic Waste	Solid wastes originated from living organisms and their metabolic waste products, and from petroleum that contain naturally produced organic compounds and are biologically decomposable by microbial and fungal action into the constituent compounds of water, carbon dioxide, and other simpler organic compounds.
Other Plastics	All waste plastics except polyethylene terephthalate (PET) containers, film plastics, and high-density polyethylene (HDPE) containers.
Ozone Depleting Gases	Gases released into the ambient air that are considered as global-warming and stratospheric ozone-depleting. These gases include chlorofluorocarbon, halons, methyl chloroform, and carbon tetrachloride.
Ozone Layer	Located in the stratosphere, approximately 10 to 30 miles above the earth's surface. This layer prevents most of the solar ultraviolet radiation (UV-B) from reaching the earth's surface. Increased exposure to UV-B could have serious public health and environmental effects.

P

Particulate Matter	Finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. The unhealthful portion, PM_{10} , is that portion less than 10 microns (i.e., ten one-millionths of a meter or 0.0004 inch) in diameter. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Particulates may adversely affect the human respiratory system, especially in those people who are naturally sensitive or susceptible to breathing problems.
Pathogen	Any viable disease-causing organism, including but not limited to bacteria, protozoa, virus, and fungus.
Peak Period	The period during which the maximum amount of travel occurs. This may be specified as the morning (a.m.) or afternoon or evening (p.m.) peak. The period when the demand for transportation service is heaviest.
Peak Storm Flows	The maximum expected flow of surface water from a 100-year, 24-hour storm.
Perched Groundwater	Unconfined groundwater separated from an underlying main body of groundwater by an unsaturated zone.
Percolation	The movement, under hydrostatic pressure, of water through the interstices of rock or soil.

Permeability	The quality of a soil horizon that enables water or air to move through it. This can be measured quantitatively in terms of rate of flow of water through a unit cross section in unit time under specified temperature and hydraulic conditions.
Permitted Capacity	That volume in cubic yards or weight in tons that a solid waste facility is allowed to receive, on a periodic basis, under the terms and conditions of that solid waste facility's current Solid Waste Facilities Permit issued by the Local Enforcement Agency under the authorization of the California Integrated Waste Management Board.
Plastics	Petroleum-derived products. The following types (listed by their numbered classification) are found in significant quantities in the municipal waste stream: (1) PET (polyethylene terephthalate) is found in beverage containers such as sodas and carbonated mineral waters; (2) HDPE (high-density polyethylene) is found in milk and water gallon jugs, small juice bottles, and bleach and detergent bottles; (3) LDPE (low-density polyethylene) is found in both film/sheet products and containers; (4) PVC (polyvinyl chloride) is used in producing plastic piping; (5) polypropylene is a versatile resin used in plastic containers for foods and other products, spun fibers for outdoor clothing, etc; (6) polystyrene when blown with an agent such as chlorofluorocarbons or pentane (as in expanded polystyrene or EPS), a resin most commonly associated with "styrofoam" cups; also in the unexpanded form of clear plastic "clamshell" take-out boxes.
Playa Lake	The flat-floored bottom of an undrained desert basin that periodically holds water.
Pleistocene	The first epoch of the quaternary period in the Cenozoic Era, characterized by the spreading and recession of continental ice sheets and the appearance of modern man.
Pliocene	The last epoch of the Tertiary Period in the Cenozoic Era, during which many modern plants and animals developed.
Point Source	A term used to designate a sizeable stationary emission source at a specific location.
Polyethylene Terephthalate Plastic (PET)	The type of plastic from which soda bottles (e.g., 2-liter) are manufactured.
Porosity	The ratio of the volume of interstices of a material to the volume of its mass.
Postclosure Maintenance	All activities undertaken at a closed landfill to maintain the integrity of containment features and to monitor compliance with applicable performance standards.
Project	A project is defined as the whole of an action that may result in a physical change in the environment. Projects include activities directly undertaken by public agencies, private projects that are supported by public agencies, and private projects that are permitted or approved by public agencies.
Project Proponent	Any person, firm, or public agency requesting approval of a project from a Lead Agency.
Putrescible Wastes	Wastes that are capable of being decomposed by microorganisms with sufficient rapidity as to cause nuisances because of odors, gases, or other offensive conditions, including materials such as food wastes and dead animals.
<u>R</u>	
Rare Species	A species that, although not presently threatened with extinction, is in such small numbers throughout its range that it may become endangered if its present environment worsens.
Rate Structure	That set of prices established by a jurisdiction, special district, or other rate-setting authority to compensate the jurisdiction, special district, or rate-setting authority for the partial or full costs of the collection, processing, recycling, composting, and/or transformation or landfill disposal of solid wastes.

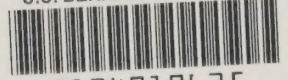
Reactive Organic Gas (ROG)	A category of organic gas that undergoes photochemical reactions. There are numerous schemes for classifying the reactivity of various types of organic gases for air pollution control purposes. The South Coast Air Quality Management District's Rule 102 limits the content of solvents based on the reactivity of various groups of contaminants. The USEPA has determined that 11 organic gases are nonreactive and exempt from regulations under State Implementation Plans.
Rear Loader	A refuse collection truck into which trash is thrown from the back of the vehicle. A compaction blade pushes the material toward the front to fully utilize the truck's capacity. Also referred to as a packer.
Recovered Material	Material that has been retrieved or diverted from disposal or transformation for the purpose of recycling, reuse, or composting. "Recovered material" does not include those materials generated from and reused on-site for manufacturing purposes.
Recyclable	A material or product that can be technologically and economically configured into a new product.
Recycling	The process of collecting, sorting, cleansing, treating, or reconstituting materials that would otherwise become solid waste and returning them to a beneficial use either directly or in the form of raw material for new, reused, or reconstituted products that meet the quality standards necessary to be used in the marketplace.
Residential Solid Waste	Solid waste originating from single- or multiple-family dwellings. Some examples of sources of residential solid waste include apartment complexes, townhomes, condominiums, and mobile homes.
Residuals	Unusable materials remaining after processing, recycling, composting, or incineration. Residuals must generally be landfilled.
Responsible Agency	A public agency, other than the Lead Agency, that has some discretionary power to approve or carry out a project for which the Lead Agency is preparing an EIR or a Negative Declaration.
Reusability	The ability of a product or package to be used more than once in its same form.
Reuse	The use, in the same form as it was produced, of a material that might otherwise be discarded.
Riparian	Pertaining to the banks of a stream, lake, or other body of water.
Rolloff Container	A storage container (10 to 60 cu. yd.) for recyclables that can be rolled onto the bed of a truck or trailer for transport.
Rolloff Truck	Usually, a 10-wheel vehicle with a load capacity of approximately 20,000 pounds, where five 60-yard containers can be loaded on or off the truck utilizing a rail or lift crane system.
Runoff	Any precipitation, leachate, or other liquid that drains from any part of a landfill.
Runon	Drainage that has the potential to enter the landfill waste management unit.
<u>S</u>	
Salvage	The controlled removal of solid waste materials at a permitted solid waste facility for recycling, reuse, composting, or transformation.
Saturated Soil Conditions	A condition in which all easily drained voids (pores) between soil particles in the root zone are temporarily or permanently filled with water to the soil surface at pressures greater than atmospheric.
Saturated Zone	An underground zone in which all openings in and between natural geologic materials are filled with water.
Scoping	The process of consultation undertaken by a Lead Agency with responsible and trustee agencies to determine the scope of a proposed EIR.
Seedbank	The layer of topsoil containing native plant seed material, which is frequently used as a "seed bank" for revegetation of native plants.

Seep	An area where water contained below the ground oozes slowly to the surface and often forms a pool.
Seismicity	The relative frequency and distribution of earthquakes.
Sensitive Receptor	Segment of the population that is more susceptible to the effects of air pollution, noise, etc. than the population at large because of age or weak health.
Sensitive Species	A generic term for any plant or animal species that is recognized by the government or any conservation group as being depleted, rare, threatened, or endangered.
Significant Ecological Area	An area containing an ecosystem of value. Designation established by the County of Los Angeles.
Significant Effect on the Environment	A substantial or potentially substantial adverse change in the physical conditions of the area affected by a project.
Slough	A small body of stagnant water or a small marshy or swampy tract of land. An inlet on a river.
Slumping	A sudden depression or sinking of geologic structures.
Source	Any particular individual or group of organisms, mechanisms, devices, structures, installations, operations, facilities, or processes that emits air pollutants.
Source Reduction	The design, manufacture, acquisition, and reuse of materials to reduce the quantity and toxicity of waste produced at the point of origin.
Source Separated	The segregation, by the generator, of materials designated for separate collection for some form of materials recovery or special handling.
Source Separation	The preparation and collection of recyclables that are segregated from the nonrecyclable portion of the waste stream.
South Coast Air Basin (SCAB)	A geographic area defined by the San Jacinto Mountains to the east, the San Bernardino Mountains to the north, and the Pacific Ocean to the west and south. The entire SCAB is under the jurisdiction of the South Coast Air Quality Management District.
Special Waste	Any hazardous waste listed in § 66740 of Title 22 of California of Code of Regulations, or any waste that has been classified as a special waste pursuant to § 66744 of Title 22 California of Code of Regulations or has been granted a variance for the purpose of storage, transportation, treatment, or disposal by the Department of Health Services pursuant to § 66310 of Title 22 of California of Code of Regulations. Special waste also includes any solid waste that, because of its source of generation, physical, chemical, or biological characteristics or unique disposal practices, is specifically conditioned in a solid waste facilities permit for handling and/or disposal.
State	The State of California.
State Implementation Plan (SIP)	A state's plan to attain the federal air quality standards for all areas within the state. The 1991 AQMP is integrated into the SIP once it is approved by the USEPA and becomes the SIP for the SCAB.
Statement of Overriding Consideration	A written statement that a Lead Agency must adopt when it approves a project that will have significant environmental effects that will not be substantially mitigated. The statement must set forth the reasons for the approval based on the final EIR or information in the record.
Stationary Sources	Those sources that emit pollution from equipment, or industrial or commercial processes. There are two types of stationary source emissions: area sources (e.g., water heaters, consumer products, architectural coatings, etc.) and point sources (e.g., boilers, refinery flares, etc.).
Substrate	Geologic term for describing soil or geologic layers underlying a project site or construction area.

Sulfur Dioxide	A colorless, pungent, irritating gas whose chemical formula is SO ₂ . Formed by the combustion of sulfurous fossil fuels at sufficiently high concentrations, SO ₂ may irritate the upper respiratory tract. At lower concentrations and combined with particulates, SO ₂ may do greater harm by injuring lung tissue.
Surface Water	Water in lakes, streams, or rivers, distinct from subsurface groundwater or stormwater runoff from precipitation.
<u>T</u>	
Threatened Species	Species that, although not presently threatened with extinction, is likely to become endangered in the foreseeable future in the absence of special protection and management efforts.
Tiering	Series of environmental impact reports wherein the coverage of general matters and environmental effects is prepared for a policy, plan, program, or ordinance and is followed by narrower or site-specific environmental impact reports, which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects that are capable of being mitigated or were not analyzed as significant effects on the environment in the prior environmental impact report.
Tipping Fee	A per-ton (or cubic-yard) charge for disposing of waste at a facility. This fee should be designed to compensate for the cost of capitalization, operation, closure, and postclosure maintenance of the facility.
Ton	A unit of weight in the U.S. Customary System of Measurement equal to 2,000 pounds. Also called short ton or net ton.
Total Dissolved Solids (TDS)	The dry residue from the dissolved matter in a water sample that remains after the sample has evaporated. The TDS serve as an indicator of the chemical quality of waters.
Transect	A sample area (vegetation) usually in the form of a long continuous strip. A line on the ground along which observations are made at some interval.
Transfer Station	A permanent facility where wastes are collected for transport by truck, railroad, or barge for more volume-efficient transport to landfills. Recycling and some processing may take place at transfer stations with authorized permits.
Transmissivity	The rate at which fluid will pass through a given area of the saturated soil zone.
Transportation Control Measures (TCMs)	Steps taken by a locality to adjust traffic patterns or lessen vehicle use to reduce vehicular emissions of air pollutants.
Transportation Systems Management (TSM)	A program for encouraging alternatives to private automobile use, such as increased reliance on public transit, carpooling, and bicycles. Also, sometimes called Transportation Demand Management (TDM).
Trip Assignment	The allocation of vehicle trips to available routes between locations in a traffic study.
Trip Generation	The number of vehicle trip ends associated with a particular land use or traffic study site. A trip end is defined as a single vehicle movement. Round trips consist of two trip ends.
Trustee Agency	A state agency that has jurisdiction by law over certain natural resources affected by a project that are held for the people of the State of California.
<u>U</u>	
Unsaturated Zone	The underground zone in which not all openings in and between natural geologic materials are filled with water. The zone may contain water and other liquids held by capillary forces or percolating liquids.

<u>V</u>	
Vadose Zone	The saturated and/or unsaturated overburden soils above the permanent groundwater table.
Vector	Includes any insect or other arthropod, rodent, or other animal capable of transmitting the causative agents of human disease, or disrupting the normal enjoyment of life by adversely affecting the public health and well-being.
Vehicle Miles Traveled (VMT)	On highways, a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in any given area or on any given highway during the time period. In transit, the number of vehicle miles operated on a given route or line or network during a specified time period.
Vehicle Trips Ends	A single or one-direction vehicle movement with either the origin or destination inside a traffic study site.
Visibility	The distance that atmospheric conditions permit a person to see at a given time and location. The visibility reduction from air pollution is due to the presence of sulfates, nitrates, and particulate matter in the atmosphere.
Volume	A three-dimensional measurement of the capacity of a region of space or a container. Volume is commonly expressed in terms of cubic yards or cubic meters. Volume is not expressed in terms of mass weight.
<u>W</u>	
Waste	Material that was once used by industry, government, or the private commercial and residential sectors, but has been disposed of and rendered unrecoverable through landfilling or incineration.
Waste Diversion	To divert solid waste, in accordance with all applicable federal, State, and local requirements, from disposal at solid waste landfills or transformation facilities through source reduction, recycling, or composting.
Waste Oil	Oil that has been emptied from a motor crankcase.
Waste Stream	The total flow of solid waste from households, businesses, institutions, and manufacturing industries that must be recycled, burned, or disposed of in a landfill.
Watershed	A region bounded by a narrow tract of high ground that divides the flow of surface waters. A region that contributes water to a particular stream channel or system of channels.
Wetlands	Land or areas (such as tidal flats or swamps) usually containing much soil moisture or having characteristic plant indicators.
White Goods	Major appliances such as refrigerators, stoves, water heaters, and dryers.
Wood Waste	Solid waste consisting of wood pieces or particles that are generated from the manufacturing or production of wood products, harvesting, processing, or storage of raw wood materials, or construction and demolition activities.

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